IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

*e*PLUS, INC.,	)	
	)	
Plaintiff,	)	**Civil Action No. 3:09-CV-620 (REP)**
	)	
v.	)	
	)	
LAWSON SOFTWARE, INC.,	)	
	)	
	)	
Defendant.	)	

**PLAINTIFF *e*PLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND
REVISED SUMMARY OF THE DEPOSITION OF HANNAH RALEIGH**

Plaintiff, *e*Plus, Inc. ("*e*Plus"), through counsel, hereby submits the following specific

objections to Defendant Lawson Software, Inc. ("Lawson")'s Counter-Deposition Designations

of the deposition of Hannah Raleigh and offers the following counter-counter designations and

revised summary:

Specific Objections

Defendant's Counter Designations	*e*Plus's Objections to Defendant's Counter Designations	*e*Plus's Counter-Counter Designations
11:6-16		
17:10-13		
43:4-7	401/402	42:16 – 43:3
45:6-11		
118:19 – 119:5	401/402	
128:14-18		
197:4-24		
206:3-15		
220:11-25	602	

Revised Summary

At the time of her deposition, Ms. Raleigh was a Practice Director at Lawson Software. (24:9-13) Her duties include overseeing customer implementations of Lawson's products at new customers in the health care industry and significant implementations of current customers in the Eastern U.S. (24:14-19; 25:6-20) Lawson's professional services organization includes roughly 300 employees in the U.S. (26:3-11) Lawson designated Ms. Raleigh to testify on behalf of the company as to several topics relating to implementation of the Accused products including customization, implementation, installation, set-up, and maintenance of the S3 Supply Chain Management suite. (10:3-13:10)

Lawson's professional services organization provides training, project management, installation, implementation, implementation consulting, upgrade consulting and some technical development for Lawson's customers. (29:24-30:7; 33:10-18) Implementation services includes business process assessments, assistance with designing the configuration of the Lawson software to meet the customer's business requirements, developing test scripts, assisting the customer with testing the software and assisting the customer with activation of the software to go live. (32:17-33:9; 103:13-105:6) While Lawson is not typically responsible for conducting actual system tests, it does typically assist its clients in conducting the system test. (206:3-18) Roughly 90% of all Lawson customers purchase these professional services. (33:19-34:5) To assist its customers, Lawson will deploy an implementation team which includes an implementation manager. (106:7-13; 107:1 – 109:2) Lawson recommends to its customers that Lawson professional services be involved in any major upgrades or installations. (92:4-25; 164:25 – 165:24; 171:19 – 172:22) When upgrading its customers, Lawson will assist[1] in data mapping and integration. (110:3-23; 126:21 – 127:20) In addition, Lawson will perform data migration services to migrate data from one application or environment level to the next application or environment level.[2] (49:23 – 51:9; 161:8 – 163:9) These services are necessary in situations where a customer is upgrading to a newer Lawson version, for example.[3] (49:23-51:9) Lawson does not typically help its customers with data extraction and cleaning and mapping efforts, but Lawson could assist in those areas if needed. (197:4-24) Two examples of customers for whom Lawson has either offered to provide implementation services or provided implementation services include the Jackson Health System and Pima County, Arizona. (212:14 – 213:18; 215:18 – 220:10; 221:1 – 222:11; 183:13-21; 185:15 – 188:2; 188:21 – 196:1) In connection with Lawson's proposal to Pima County, Lawson proposed to share responsibility for the migration of data from Pima County's legacy system into the Lawson procurement system, for performing a test load of data, for cleansing the data and for performing a full migration systems test. (190:3-193:5) For Jackson Health System, Lawson's implementation services included implementation of the procurement suite including the purchase order, requisitions, inventory control, requisitions self-service and EDI applications. (209:8-14) The implementation services Lawson provided to Jackson Health System also included conversion of data in Jackson's legacy system

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[1] Lawson inserts the phrase "in some circumstances." *e*Plus objects to this insertion as mischaracterizing the testimony.

[2] Lawson asks that this sentence be deleted *in toto*. *e*Plus objects.

[3] Lawson asks that this sentence be deleted *in toto*. *e*Plus objects.

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vendor master and item master. Lawson's consultants loaded the item master and vendor master data into the Lawson procurement system. (212:20-213:18; 215:18-217:19; 222:13-228:6) Lawson did not assist or collaborate with Jackson in coding program logic to map data from legacy or non-Lawson systems to Lawson API file layout. (220:11-25)

Lawson also provides learning services which include instructor led training courses conducted on-site or online and access to an online knowledge base. (30:20-31:8; 52:15-54:21; 82:10-83:25) Lawson makes available to its customers a list of course offerings in a course catalog. (57:3 – 58:9) Three examples of courses offered by Lawson include Inventory Control 8.1/9.0x, where a user is taught key setup components and processing functionality including item related setup, Procurement Attributes 8.1/9.0 which includes hands-on exercises for creating and using user defined and Lawson defined attributes and Requisition 8.1/9.0 where a student is taught the major features of Lawson's requisition self service module including searching the catalog for items, using shopping lists, ordering specials or services and ordering categories. (58:21 – 63:4)

Every Lawson customer uses the learning services at some point. (31:9-18) Lawson customers must pay additional fees to use these professional services. (31:19-32:1; 34:6-12) These professional services are priced using a standard rate card. (41:12-20) Lawson may give its customers price discounts which are given on a customer-by-customer basis. (42:16 – 43:7) In 2009, Lawson derived between $20 and $25 million for professional services from its health care customers in the Eastern U.S. alone. (38:18-39:9) In the 12 months prior to her deposition, Lawson had taken 13 new supply chain management systems live. (76:11-24)

Lawson provides installation training for between 90% and 100% of its new customers. (101:11-16) Lawson provides an installation guide for each licensed Lawson application. (173:20-23) Lawson directly provides installation services for 80-85% of new installation projects. (74:11-24; 75:3-16) The relationship between Lawson and its customers is governed by a Statement of Work. (119:20-120:13) Any changes to an implementation project desired by a customer must be approved by Lawson. *Id*. If a customer modifies its software, Lawson will not provide support; it will continue to support non-modified areas. (156:21-157:13) Lawson follows up its installation services with quality assurance testing which includes identifying critical business processes, developing test scripts for those processes and facilitating the testing. (97:3-98:1) Lawson also sometimes assists with configuration of the punchout application, including assisting vendors in configuring their punchout sites. (173:20-175:2; 178:3-19).

Lawson also provides its customers with managed services. (35:4-7) A Lawson customer can purchase four levels of support: bronze, silver, gold and platinum. (143:17-21) Lawson cannot support its customers unless they have a computer with an internet connection. (155:15-156:2) Lawson is able to access its customer's system remotely to provide support. (148:23-149:3) The bronze level includes product upgrades, correction self-service tools and maintenance of customers' systems. (143:7-22; 145:16-146:5) The silver level includes all offerings of the bronze level as well as non-warranty support, 24/7 emergency support, priority queing, and online usage reports and statistics. (146:6-147:2) At the gold level, Lawson will provide application management services. (43:21-44:3) At the platinum level, Lawson physically hosts its customers' servers. (35:4-22; 43:21-44:3).

Customers access hosted services through the Lawson computer network. (36:14-37:11) All of the standard procurement functionality can be performed via S3 procurement systems hosted by Lawson. (37:12-38:5) When performing hosted services, Lawson will also assist in the installation of hardware, such as providing mobile supply chain hand held devices. (100:10-21) One example of a customer for whom Lawson hosts the Lawson S3 system is Fayette Regional Medical Center who licenses Lawson's supply chain procurement software. (47:19-48:1; 48:7-14) At the time of Ms. Raleigh's deposition, Lawson provided hosted services for 13 of its customers. (76:25 – 77:6)

Lawson customers are required to purchase maintenance services for at least the first year after they purchase the Lawson software. (44:14-23) If a customer does not renew its maintenance agreement, it is no longer eligible to receive upgrades and support services. (44:24-45:5) Ms. Raleigh was not aware of any restrictions placed on its customers with respect to earlier purchased versions.[4] (45:6-11)

Lawson has numerous tools to assist its customers including online leaning suites, project team training, data migration workshops and on-site training courses. (49:23-51:9; 93:20-94:8; 94:14-97:2) These programs cover all aspects of the Lawson product suite including requisition self-service, configuration of punchout, conversion processing, inventory control and purchase order creation. (132:22-134:14) Lawson customers can also receive interactive support services online from a Lawson employee. (86:7 – 87:10; 88:25 – 89:17)

Lawson's S3 inventory control application includes a native import/ export utility to upload data onto the system. (77:25-79:10) With respect to building an item database, Lawson's services include populating specific setup criteria and helping customers make decisions on how best to populate the setup criteria. (101:24-102:15; 102:20-103:12) This item database can be imported onto the Lawson system. Lawson provides its customers with data import tools which may include UNSPC codes. (16:25-17:9) Lawson does not provide its clients with training concerning how to import UNSPSC tools into the procurement application. (17:10-13) Lawson trains its customers as to how to set up the item master database and the data validation rules for its S3 procurement applications using conversion workbooks, services and training. (58:21-59:21; 81:3; 82:5) Lawson provides its customers with file formats which specify the proper format for data files to be loaded into the Lawson system. (84:19-85:5) Lawson also can assist its customers in actually loading the data and with data cleaning for the vendor master database and the item master database. (125:2-25)

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[4] Lawson contends this sentence should read "A customer would be able to continue using the system at whatever version level it was currently using." *e*Plus objects to this sentence as mischaracterizing testimony.

Respectfully submitted,

_____/s/_____
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Attorneys for Plaintiff, ePlus Inc.

Dated: August 11, 2010

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Raleigh, Hannah   3/4/2010 12:00:00 AM

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1   IN THE UNITED STATES DISTRICT COURT
.   FOR THE EASTERN DISTRICT OF VIRGINIA
2   Richmond Division
3   CIVIL ACTION NO. 3:09-CV-620 (JRS)
4   ePLUS INC.
5   Plaintiff,
6   vs.
7   LAWSON SOFTWARE, INC.
8   Defendant.
9   _X
10
11
12
13   Videotaped Deposition
14   of
15   HANNAH RALEIGH
16
17
18
19   1111 Brickell Avenue
.   Suite 2500
20   Miami, Florida
21
22
23
24   Thursday, March 4, 2010
25   8:43 a.m. - 4:30 p.m.

Page 2

1   A P P E A R A N C E S
2   For the Plaintiff:
3   JENNIFER A. ALBERT, ESQUIRE
.   Goodwin Procter LLP
4   901 New York Avenue, N.W.
.   Washington, DC 20001
5   (202) 346-4000
.   For the Defendant Lawson Software, Inc:
6
.   WILLIAM SCHULTZ, ESQUIRE
7   Merchant & Gould P.C.
.   3200 IDS Center
8   80 South 8th Street
.   Minneapolis, Minnesota 55402-2215
9   (612) 332-5300
10   Also Present: Douglas Boggs, Videographer
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14
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22
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24
25

Page 3

Page 4

5

1   THE VIDEOGRAPHER: Here begins

2   videotape number one in the deposition of

3   Hannah Raleigh in the matter of ePlus

4   Incorporated versus Lawson Software,

5   Incorporated, et al. It is filed in the

6   United States District Court, the eastern

7   district of Virginia. The case number is

8   09CV232. Today's date is March 4, 2001.

9   We're now starting at 8:43 on the video

10   monitor.

11   My name is Douglas Boggs, the video

12   technician for Merrill Legal Solutions. The

13   deposition is being taken place at Hunton &

14   Williams in Miami, Florida. The court

15   reporter today is Carol Williams of Merrill

16   Legal Solutions.

17   Would counsel please state their

18   appearance for this record.

19   MS. ALBERT: Jennifer Albert with the

20   law firm of Goodwin Procter representing the

21   plaintiff ePlus Incorporated.

22   MR. SCHULTZ: William Schultz of

23   Merchant and Gould, PC, representing Lawson

24   Software, Incorporated.

25

7

1   under the same obligation as if you were in court

2   to testify truthfully and completely?

3   A.   I do.

4   Q.   If any of my questions today are

5   unclear, let me know and I'll try and rephrase

6   them. Is that acceptable?

7   A.   Yes.

8   Q.   If you need to take a break at any

9   time, please let me know. I'll try to

10   accommodate you. I may ask if a question is

11   pending that you complete the answer to that

12   question before breaking.

13   Are you taking any medication or drugs

14   that would affect your ability to answer my

15   questions truthfully and accurately?

16   A.   No.

17   Q.   Is there any reason that you feel that

18   you would not be able to give truthful and

19   accurate answers to my questions today?

20   A.   No.

21   Q.   Your counsel may object from time to

22   time, but unless your counsel specifically

23   instructs you not to answer one of my questions,

24   I expect that you would answer my questions. Is

25   that acceptable?

6

1   THEREUPON:

2   HANNAH RALEIGH,

3   was called as a witness and, being first duly

4   sworn, was examined and testified as follows:

5   EXAMINATION

6   BY MS. ALBERT:

7   Q.   Ms. Raleigh, can you please provide

8   your full name, residence address and business

9   address for the record.

10   A.   Sure. Hannah Edmundson Austin Raleigh

11   Weber. Well, my business address would -- I work

12   out of a home office. Is that what you would

13   like me to provide?

14   Q.   That's fine. Just an address for the

15   record.

16   A.   It's 3668 U.S. Highway 20, Nassau,

17   New York 12123.

18   Q.   Would you prefer that I refer to you as

19   Ms. Weber?

20   A.   Ms. Raleigh is fine.

21   Q.   My name is Jennifer Albert, and I

22   represent the plaintiff ePlus Incorporated in

23   this matter.

24   Do you understand that the answers you

25   are giving today are under oath, and you are

8

1   A.   Yes.

2   Q.   The court reporter needs to take down

3   everything that we say today. She can't take

4   down nonverbal responses or shakes of the head.

5   So you need to audibly voice the answers to my

6   questions. Do you understand?

7   A.   Yes.

8   Q.   Have you ever been deposed before?

9   A.   Yes.

10   Q.   What -- in connection with what type of

11   matter were you deposed?

12   A.   In connection with another lawsuit

13   brought to Lawson.

14   Q.   So were you testifying on behalf of

15   Lawson --

16   A.   Yes.

17   Q.   -- in that matter? Who was the other

18   party in the matter besides Lawson, do you

19   recall?

20   A.   I don't know what the official title

21   was. They are former Lawson employees.

22   Q.   What was the nature of that matter?

23   A.   It was a wage-and-hours dispute.

24   Q.   Have you ever provided testimony before

25   in connection with a patent infringement matter?

9

1   A.   No.

2   Q.   Let me -- the court reporter has marked

3   as Raleigh Exhibit 1.

4   (Thereupon, Second Notice of Deposition

5   was marked as Exhibit 1 for

6   identification.)

7   Q.   A copy of plaintiff ePlus

8   Incorporated's second notice of deposition of

9   defendant Lawson Software, Incorporated pursuant

10   to rule 30(b)(6) of the Federal Rules of Civil

11   Procedure. Have you ever seen this corporate

12   deposition notice before?

13   A.   I believe so.

14   Q.   Can you turn to page 9 of the

15   deposition notice. Do you see at the bottom of

16   the page there is a heading Topic Areas for Rule

17   30(b)(6) of Lawson?

18   A.   Yes.

19   Q.   And then the topics continue from that

20   page through the end of the document, do you see

21   that?

22   A.   Yes.

23   Q.   And do you understand that pages 9

24   through 14 of the notice set forth the topics for

25   which ePlus has requested that Lawson provide a

10

1   witness to testify on its behalf?

2   A.   Yes.

3   Q.   Do you understand that Lawson has

4   designated you to testify on its behalf

5   concerning some aspects of topic number 1, which

6   reads, "The architecture, functionality,

7   operation, customization, implementation,

8   installation, setup, and maintenance of Lawson's

9   Electronic Sourcing and Procurement Systems

10   and/or Services from 2003 to the present time,

11   including versions from 2003 to the present time

12   and any future releases during the pendency of

13   this litigation, including, but not limited, to

14   Lawson S3 Supply Chain Management suite, Lawson

15   M3 Supply Chain Management suite, Lawson

16   Procurement, Lawson Requisitions, Lawson

17   Requisitions Self Service, Lawson Inventory

18   Control, Lawson Purchase Order and Lawson

19   Procurement punchout and any Inventory Control

20   Module, Purchase Order Module, Order Entry

21   Module, Requisitions Module, Requisitions Self

22   Service Module, Retail Operations Module,

23   Purchasing Module, eProcurement Module, or any

24   other supply chain management suite or module"?

25   A.   Yes. With the exception of M3.

11

1   Q.   So you understand that you're

2   designated to testify on Lawson's behalf

3   concerning topic number 1 with the exception of

4   the aspect related to the M3 system?

5   A.   Yes.

6   MR. SCHULTZ: Just for the record,

7   Ms. Albert, I'm referring to an e-mail dated

8   February 22nd from Michael Strapp.

9   Ms. Raleigh is designated to testify as

10   to topic number one with respect to the

11   customization, implementation, installation,

12   set-up and maintenance of the Lawson S3

13   Supply Chain Management suite.

14   And that is the limitation on the

15   topics that she has been designated for for

16   topic one.

17   Q.   Thank you. Ms. Raleigh, do you

18   understand that Lawson has also designated you to

19   testify on its behalf concerning certain aspects

20   of topic number 2?

21   A.   Yes. With the exception of the M3,

22   Supply Chain Management suite.

23   Q.   With respect to topic number 1, are you

24   prepared to testify as to all matters known or

25   reasonably available to Lawson regarding the

12

1   aspects of that topic for which you have been

2   designated?

3   A.   Yes.

4   Q.   And with respect to topic number 2, are

5   you also prepared to testify as to all matters

6   known or reasonably available to Lawson regarding

7   the aspects of that topic for which you have been

8   designated?

9   A.   Yes.

10   Q.   Do you also understand that you have

11   been designated to testify on Lawson's behalf

12   with respect to topic number 3, which relates to

13   catalog creation, addition, integration and use

14   with Lawson's electronic sourcing and procurement

15   systems and or services?

16   A.   Yes.

17   Q.   And are you prepared to testify as to

18   all matters known or reasonably available to

19   Lawson regarding that topic?

20   A.   Yes.

21   Q.   Do you understand that Lawson has also

22   designated you to testify on its behalf

23   concerning topic number 4, which relates to data

24   management, catalog content management services

25   provided or made available to customers of

13

1   Lawson's electronic sourcing and procurement
2   systems and/or services, including but not
3   limited to data acquisition, extraction, import,
4   normalization, cleansing, synchronization and
5   standardization services?
6   A.   Yes.
7   Q.   Are you prepared to testify as to all
8   matters known or reasonably available to Lawson
9   concerning topic number 4?
10   A.   Yes.
11   MR. SCHULTZ: Before you continue, also
12 with respect to topics number 2 and 3, again,
13 I'm referring to a Michael Strapp e-mail
14 dated February 22, 2010.
15   With respect to category number two,
16 Ms. Raleigh is the deponent for the 30(b)(6)
17 deposition notice to the extent that topic
18 deals with catalog creation, addition,
19 integration and use provided by Lawson to its
20 customers, and with respect to category
21 number 3, data management and catalog content
22 management services provided by Lawson to its
23 customers.
24   MS. ALBERT: I don't know if I
25 understand the distinction that you're

15

1   Q.   When did that meeting take place?
2   A.   Monday -- last Monday.
3   Q.   How long did the meeting last?
4   A.   Approximately two hours.
5   Q.   Did you review any documents in the
6   course of that meeting?
7   A.   No.
8   Q.   You said you spoke with a consultant.
9   With whom did you speak?
10   A.   Eric Swingler.
11   Q.   Can you spell that last name?
12   A.   S-w-i-n-g-l-e-r.
13   Q.   What is Mr. Swingler's position?
14   A.   He is a principal procurement
15 consultant.
16   Q.   Is he employed by Lawson?
17   A.   Yes.
18   Q.   What are his responsibilities as a
19 principal of procurement consultant?
20   A.   He is responsible for the training of
21 customers, implementation activities,
22 configuration, assistance, testing assistance,
23 all of the aspects of our implementation approach
24 with his designated customers.
25   Q.   Is there a particular industry group

14

1   drawing between the words of that -- of the
2   topic and the limitations that you're placing
3   on it. I'm not sure I understand.
4   MR. SCHULTZ: Well, we received the
5   clarification with respect to the scope of
6   this witness' testimony, and that was in the
7   February 22, 2010 e-mail.
8   This witness was prepared for the
9   documents that are concerned in the February
10 22nd e-mail.
11   Other witnesses have already testified
12 with respect to topics 1 through 4 to
13 categories that were not listed in the
14 February 22nd e-mail.
15   Q.   Ms. Raleigh, what did you do in order
16 to prepare to testify today on Lawson's behalf?
17   A.   I met with a representative of Lawson's
18 attorney to understand the topics included in the
19 deposition.
20   I spoke with one of the consultants
21 that works with me -- works for me on our
22 procurement applications to clarify certain
23 aspects of my understanding.
24   Q.   With what attorney did you meet?
25   A.   Joshua Graham.

16

1   for which he has responsibilities?
2   A.   Healthcare.
3   Q.   Are there other individuals with the
4   position of principal procurement consultant that
5   have responsibility for other industry verticals?
6   A.   Yes.
7   Q.   Do you know any of those persons that
8   would be referred to as a principal procurement
9   consultant for other industry verticals?
10   A.   Yes.
11   Q.   Who are those individuals?
12   A.   I don't have a list of -- I don't have
13 an org chart.
14   Q.   Do you recall any of their names?
15   A.   Not at the moment.
16   Q.   Would you need to refer to an
17 organizational chart in order to refresh your
18 recollection on that?
19   A.   Yes.
20   Q.   What did you discuss with Mr. Swingler?
21   A.   We discussed specifically the UNSPSC
22 codes and Lawson's involvement with those codes,
23 and we discussed the specific functionality of
24 the 832 EDI transaction.
25   Q.   And what did Mr. Swingler tell you with

17

1 respect to Lawson's involvement with UNSPSC

2 codes?

3   **A. That we are not involved with assigning**

4 **items for a customer to UNSPSC codes.**

5   Q. Does Lawson provide its clients with

6 data import tools to input UNSPSC codes into the

7 application?

8   **A. Lawson provides its customers with data**

9 **import tools that could include that field.**

10   Q. Does Lawson provide its clients with

11 training concerning how to import UNSPSC tools

12 into the procurement application?

13   **A. No.**

14   Q. And what did Mr. Swingler tell you with

15 regard to the functionality of the EDI 832

16 transaction?

17   **A. He confirmed my understanding that the**

18 **832 transaction is meant for vendors to provide**

19 **their customers, so in our case, say, a hospital,**

20 **with updated pricing information regarding on**

21 **items that that hospital or that that customer**

22 **has purchased from that vendor.**

23   Q. And that's an electronic transmission

24 from the vendor to the client; is that your

25 understanding?

18

1   **A. That's correct.**

2   Q. And if the client has installed

3 Lawson's EDI for supply chain management

4 application, the customer would be able to

5 receive that electronic transmission from the

6 vendor; is that correct?

7   **A. Depending on our relationship with the**

8 **vendor, they would be capable of receiving that.**

9   Q. Did you meet with or speak to any other

10 Lawson employees in order to prepare for your

11 deposition today, in addition to Mr. Swingler?

12   **A. No.**

13   Q. Did you review any documents on your

14 own, you know, outside of meetings with your

15 attorneys in order to prepare to testify today?

16   **A. Not specifically to prepare for the**

17 **testimony.**

18   Q. Just for the record, I will have the

19 reporter mark as Raleigh Exhibit 2 a copy of

20 plaintiff ePlus, Inc.'s notice of deposition of

21 Hannah Raleigh.

22   (Thereupon, Notice of Deposition was

23   marked as Exhibit 2 for

24   identification.)

25   Q. Ms. Raleigh, have you ever seen the

19

1 document that has been marked as Exhibit 2 before

2 today?

3   **A. Yes.**

4   Q. Do you understand that you are

5 appearing here today in your individual capacity

6 in addition to your capacity as a representative

7 of Lawson?

8   **A. Yes.**

9   Q. Can you describe for me your

10 educational background starting after high

11 school?

12   **A. Certainly. I have a bachelor's of**

13 **science degree from Northwestern University.**

14   Q. Was that degree in any particular

15 discipline?

16   **A. Psychological services.**

17   Q. When did you receive that degree?

18   **A. 1996.**

19   Q. Did you have any postgraduate degrees?

20   **A. No.**

21   Q. Are you the inventor on any patents?

22   **A. No.**

23   Q. What was your first employment position

24 after you completed your education?

25   **A. Administrative assistant at Campbell**

20

1 **Software.**

2   Q. How long were you in that position?

3   **A. Six months.**

4   Q. What was your next position following

5 that position?

6   **A. Support consultant at Campbell**

7 **Software.**

8   Q. How long were you in that position?

9   **A. Six months.**

10   Q. What was your next position after

11 support consultant?

12   **A. Implementation consultant at Campbell**

13 **Software.**

14   Q. How long were you in that position?

15   **A. Nine months.**

16   Q. What types of systems were you

17 implementing in that position?

18   **A. We were implementing labor scheduling**

19 **and time and attendance systems.**

20   Q. What was your next position after

21 implementation consultant?

22   **A. That's when I moved to Lawson, so human**

23 **resources application consultant at Lawson**

24 **Software.**

25   Q. So around what time frame would this be

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21

1 that you moved to Lawson?
2   A.   March of 1998.
3   Q.   How long were you in the position as
4 human resource applications consultant?
5   A.   18 months.
6   Q.   What was your next position at Lawson?
7   A.   Project leader.
8   Q.   For what type of projects were you a
9 leader?
10   A.   Implementations of Lawson's three
11 suites of software in healthcare organizations.
12   Q.   When you say Lawson's three suites of
13 software, what suites are you referring to?
14   A.   Human resources, financials and
15 procurement.
16   Q.   So this would be in approximately the
17 what, November 1998 time frame, that you started
18 this position?
19   A.   Roughly.
20   Q.   How long were you in the position as
21 project leader at Lawson?
22   A.   Let me think for a moment. Roughly 15
23 months.
24   Q.   So that takes us to early 2001 time
25 frame?

22

1   A.   Yes.
2   Q.   What were your responsibilities as a
3 project leader?
4   A.   To work with my customers, my assigned
5 customers, to plan, staff and oversee their
6 implementations of Lawson's products.
7   Q.   You said this was in the healthcare
8 vertical; is that correct?
9   A.   That's correct.
10   Q.   Do you know approximately how many
11 implementation projects you were involved in as a
12 project leader that would have related to
13 procurement implementations?
14   A.   It's difficult for me to give you an
15 exact number.
16   Q.   Do you have any sort of educated
17 estimate?
18   A.   Four, that I can recall.
19   Q.   Do you recall which clients those were?
20   A.   Yes.
21   Q.   What were the clients for which you did
22 procurement implementations?
23   A.   Clarian Health Partners, Methodist
24 Hospitals of Dallas, Alton Oschner medical
25 foundation or Oschner hospital. However, that

23

1 was an upgrade as I recall, not an
2 implementation. I'm sorry, I can't recall.
3   Q.   Then you said that you started a new
4 position at Lawson in early 2001. What was that
5 position?
6   A.   Client service manager.
7   Q.   How long were you in that position?
8   A.   Until June of 2003.
9   Q.   What were your responsibilities as a
10 client service manager?
11   A.   They were the same as the project
12 leader responsibilities with the added
13 responsibility of direct management of
14 consultants.
15   Q.   So did you have responsibilities for
16 the same three product suites, HR, financials and
17 procurement in the position as client service
18 manager?
19   A.   Yes.
20   Q.   And were you also in the healthcare
21 vertical?
22   A.   Yes.
23   Q.   What position did you assume in June of
24 2003?
25   A.   Project manager.

24

1   Q.   How long were you in that position?
2   A.   Until February of 2006.
3   Q.   What were your responsibilities as a
4 project manager?
5   A.   They were the same as the client
6 service -- the same as the project leader. So it
7 removed the direct management of employees from
8 that role.
9   Q.   In February of 2006 what position did
10 you assume?
11   A.   Practice director.
12   Q.   How long were you in that position?
13   A.   I'm currently in that position.
14   Q.   What are your responsibilities as
15 practice director?
16   A.   To oversee customer implementations of
17 Lawson's products at new customers and
18 significant implementations of current customers
19 in the eastern region of the United States.
20   Q.   How does the position as practice
21 director differ from your prior positions?
22   A.   The prior positions I was a -- I was
23 directly responsible for individual projects.
24 This position is sort of one level above that, so
25 I don't directly manage the projects myself. I

25

1 manage the teams and oversee the teams who are

2 managing and implementing the software.

3   Q.   Do you have individuals who report to

4 you?

5   A.   Yes.

6   Q.   How many employees report to you?

7   A.   Currently 12.

8   Q.   What are their functional

9 responsibilities?

10   A.   Project managers and business

11 consultants.

12   Q.   Now, in connection with your position

13 as practice director, do you still have

14 responsibilities for the same three product

15 suites that you have mentioned previously, the

16 HR, the financials and procurement?

17   A.   Yes. Generally speaking, yes. But

18 essentially any product my customer purchases

19 would be within my purview. Lawson's product

20 suite has grown over the years.

21   Q.   To whom do you report?

22   A.   Martin Jokinen.

23   Q.   Can you spell that?

24   A.   Martin, M-a-r-t-i-n, Jokinen,

25 J-o-k-i-n-e-n.

27

1 conducted at the global solutions center in

2 Manila?

3   A.   Mainly technical work, which we would

4 define as including -- loosely including

5 development, customization, in some cases

6 support.

7   Q.   What types of support services would be

8 offered by the global solutions center?

9   A.   Customer support for software issues.

10   Q.   What types of customer support services

11 are offered, specifically by the global solutions

12 center?

13   A.   I don't know that I can answer your

14 question.

15   Q.   Is a help desk run out of the global

16 solutions center?

17   A.   There are members of our help desk that

18 reside in the -- in Manila.

19   Q.   Does Lawson ever make use of partners

20 outside of Lawson to assist in the delivery of

21 professional services?

22   A.   Yes.

23   Q.   In what circumstances?

24   A.   There are circumstances in which our

25 customers ask that we use delivery partners to

26

1   Q.   What is Mr. Jokinen's position?

2   A.   Vice-president, health care delivery.

3   Q.   What is the size of the Lawson

4 professional services organization, do you know

5 how many employees?

6   A.   Globally?

7   Q.   Yes. Let's start there.

8   A.   I believe it's roughly 1500.

9   Q.   And how many are located in the United

10 States?

11   A.   Roughly 300.

12   Q.   Have you heard of something referred to

13 as a global solutions center?

14   A.   Yes.

15   Q.   What is that?

16   A.   The global solutions center -- I'm

17 sorry. I have used the same terminology to refer

18 to different aspects of our organization at

19 different times. I think what you're referring

20 to is our organization in Manila, our offshore

21 organization.

22   Q.   Is there a global solutions center in

23 the United States?

24   A.   Not at this time.

25   Q.   What do -- what types of activities are

28

1 assist in the implementations.

2   There are circumstances in which we do

3 not have internally either the bandwidth or the

4 correct skills for the work that our customer

5 wants us to do, and we might source resources

6 from a third party or a partner.

7   We also have partners that are

8 complimentary partners to our product that we

9 might again not have a skill set in our

10 organization.

11   Our customers also can choose other

12 companies to implement Lawson. So sometimes it's

13 not that Lawson chose a partner to work on a

14 project, but that the customer chose the other

15 company.

16   Q.   Are there particular entities that are

17 certified as a Lawson partner for implementation

18 services?

19   A.   There is a certification program. And

20 there are certain entities who have some

21 certified consultants. The entire practice is

22 not certified in any way. But specific

23 consultants might be certified.

24   Q.   Are there some specific entities that

25 Lawson regularly recommends to clients for

29

1 assistance in connection with installation or

2 implementation of the S3 Supply Chain Management

3 applications?

4   A.   No.

5   Q.   Do you know how many S3 Supply Chain

6 Management implementation projects Lawson has had

7 in the last 12 months?

8   A.   No. I don't have that number.

9   Q.   How could you find out that number?

10   A.   I could find out that number.

11   Q.   Maybe at a break we could try to get

12 that information.

13   MR. SCHULTZ: We can try.

14   Q.   Do you know how many Lawson S3 Supply

15 Chain Management client systems have gone live in

16 the last 12 months?

17   A.   Not offhand, no.

18   Q.   Would there be a way that you could

19 find that information out?

20   A.   Yes.

21   Q.   Could we try to find out the answer to

22 that question perhaps on a break as well?

23   MR. SCHULTZ: We could.

24   Q.   What are all the different types of

25 services provided by Lawson's professional

30

1 services organization?

2   A.   Generally speaking, we provide training

3 services. We provide project management

4 services. We provide implementation consulting.

5 We provide upgrade consulting. And we provide

6 services for technical development, such as

7 interface development, customization development.

8   Q.   Does the Lawson professional service

9 organization offer services that are referred to

10 as business consulting?

11   A.   Yes.

12   Q.   How would you describe the various

13 services that fall under that rubric?

14   A.   It's a very broad category. Our

15 consultants are referred to as business

16 consultants. So essentially any of the services

17 that they might provide in the variety of

18 different settings or circumstances would be

19 considered business consulting.

20   Q.   Does the Lawson professional service

21 organization offer services that are referred to

22 as learning services?

23   A.   Yes.

24   Q.   How would you describe the types of

25 services that fall under that category?

31

1   A.   Generally, those services could include

2 public instructor led training in one of our

3 offices or on-site instructor led training for a

4 specific customer at their site or a variety of

5 different online learning services, such as

6 webex's virtual labs and even an online learning

7 library of static courses that could be viewed on

8 demand.

9   Q.   Do you know for what percentage of S3

10 Supply Chain Management licensees Lawson provides

11 learning services?

12   A.   I would estimate that over a course --

13 over the course of a customer's engagement with

14 Lawson, meaning their entire life cycle as a

15 customer, I would venture a guess that every

16 customer probably at some point or another

17 accesses these types of learning services, one

18 type or another.

19   Q.   Do some learning services -- are some

20 learning services provided standard with the

21 license fee that a customer would pay?

22   A.   No.

23   Q.   So learning services are an extra fee

24 in addition to a license fee or a maintenance

25 fee?

32

1   A.   That's correct.

2   Q.   You indicated that the Lawson

3 professional services organization does provide

4 services that would be referred to as

5 implementation upgrade services, correct?

6   A.   That's correct.

7   Q.   How would you describe the nature of

8 those types of services?

9   A.   Upgrade services generally focus on the

10 explanation of the differences between the

11 customer's current version and the version to

12 which they will be upgrading, advising the

13 customer on the appropriate configuration of any

14 new functionality included in the new version,

15 and assisting a customer with the testing of

16 their data in the new version.

17   Q.   How would you describe the nature of

18 services provided that would be referred to as

19 implementation services?

20   A.   Those services might include business

21 process assessment, so understanding how the

22 customer does business today on their current

23 software and relating that to how they will do

24 business using the Lawson Software.

25   Assistance with designing the

33

1 configuration of the Lawson Software to meet
2 those customer's business requirements. That
3 could be done on paper or perhaps with the
4 customer actually into the system or both.
5   Assisting a customer with developing
6 test scripts and assisting the customer with
7 actually testing the software and assisting a
8 customer with their activation of the software to
9 go live.
10   Q.   Do installation services fall under the
11 heading of implementation consulting?
12   A.   They would, but they are not performed
13 by business consultants. They are performed by
14 systems consultants. So -- but, yes, they would
15 be part of an implementation.
16   Q.   Does Lawson's professional services
17 organization provide installation services?
18   A.   Yes.
19   Q.   For what percentage of S3 Supply Chain
20 Management licensees does Lawson provide
21 implementation and upgrade services?
22   A.   Again, because our customers don't just
23 do their first implementation, but they will also
24 do upgrades and many other types of projects
25 throughout the life cycle of their relationship

34

1 with Lawson, I would say over the course of that
2 relationship, it's possible that, you know, 90
3 percent or more of Lawson's customers engage in
4 some way with Lawson professional services at
5 some time for some form of assistance.
6   Q.   And Lawson charges additional fees to
7 its clients for implementation and upgrade
8 consulting services in addition to these for the
9 license to the software itself; is that correct?
10   A.   That's correct. When our customers
11 choose Lawson professional services to do that
12 work, that's correct.
13   Q.   Does Lawson's professional service
14 organization offer services that are referred to
15 as packaged services?
16   A.   Yes. At times we have used that
17 phrase.
18   Q.   How would you describe the types of
19 services that fall under that designation?
20   A.   Typically a packaged service would
21 include potentially some actual content, some
22 prebuilt content that would accelerate a
23 customer's implementation of a particular feature
24 or function.
25   And typically those packaged services

35

1 include also the consulting and/or learning
2 services associated with helping the customer use
3 what is in that package.
4   Q.   Does the Lawson professional service
5 organization offer services that are referred to
6 as managed services?
7   A.   Yes.
8   Q.   What are the nature of the services
9 that fall under that designation?
10   A.   Those services fall into predominantly
11 two categories. One would be application
12 management services where Lawson professionals
13 perform the system maintenance on behalf of a
14 customer.
15   The second category would be referred
16 to as hosting services where Lawson physically
17 hosts the customer server and provides
18 application management services.
19   Q.   Are there S3 Supply Chain Management
20 licensees who receive managed services from
21 Lawson's professional services organization?
22   A.   Yes.
23   Q.   Do you have any idea how many clients?
24   A.   I don't know.
25   Q.   How could you find that information

36

1 out?
2   A.   I could find that information out. I
3 would need to work with that part of our
4 organization.
5   Q.   Can we add that to the list of
6 questions to try to find an answer to?
7   MR. SCHULTZ: I'm sorry, what
8 specifically are we asking?
9   MS. ALBERT: For what percentage of --
10 or what number of S3 Supply Chain Management
11 licensees does Lawson provide managed
12 services, in other words, systems maintenance
13 or hosting services.
14   Q.   Can you describe the nature of the
15 hosted environments that Lawson provides for its
16 S3 Supply Chain Management clients that utilize
17 that services?
18   A.   The nature of it would be a server
19 physically located in space that Lawson owns or
20 is -- leases.
21   Q.   For example, if there was a client that
22 Lawson hosted its procurement system, would the
23 system hosted by Lawson include an item master
24 database?
25   A.   Yes.

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1   Q.   How is data loaded into those item

2   master databases that are on systems hosted by

3   Lawson?

4   A.   The same way it's loaded into systems

5   that are not hosted by Lawson. There is no

6   difference.

7   Q.   How do the clients access these hosted

8   systems in order to conduct procurement

9   activities?

10   A.   Through the Internet, essentially,

11   through our network.

12   Q.   So clients could use these hosted

13   procurement systems to search for items to

14   requisition; is that correct?

15   A.   Yes. To perform all of the business

16   functions that they use on the software.

17   Q.   So they could use these procurement

18   systems that are hosted by Lawson to search for

19   items in an item master database that they wish

20   to requisition?

21   A.   Let me make one point of clarification.

22   The system is not Lawson's system. It is

23   physically housed in a Lawson facility, but it is

24   the customer's system. It's the customer's.

25   Q.   But all the functionality that the S3

38

1   procurement applications are capable of could be

2   accessed by the client on those procurement

3   systems hosted in the Lawson facilities, correct?

4   A.   On their own system, yes, on the

5   customer's own system, yes.

6   Q.   What were the -- what were Lawson's

7   total revenues attributable to professional

8   services for fiscal year 2009?

9   A.   I don't have that number handy.

10   Q.   Could we try --

11   MR. SCHULTZ: That also seems outside

12   of the scope of the 30(b)(6). We will object

13   to that as being outside the scope.

14   Q.   Well, in your individual capacity do

15   you have any knowledge of that information?

16   A.   Could you rephrase the question or

17   restate the question?

18   Q.   What were Lawson's total revenues

19   attributable to professional services for fiscal

20   year 2009?

21   A.   I can tell you that my practice, which

22   is only one portion of Lawson's professional

23   services organization, the revenues were

24   somewhere between 20 and $25 million. I could

25   get an exact figure if that's needed.

39

1   Q.   And you're responsible for the eastern

2   region?

3   A.   Of healthcare.

4   Q.   Of healthcare. What geographic region

5   constitutes the eastern region?

6   A.   Roughly from the tip of -- the northern

7   tip of Main to the southern tip of Florida, from

8   the Atlantic ocean to the western edge of Ohio,

9   to Tennessee and Alabama.

10   Q.   Do you have any projections for

11   professional service revenues for fiscal year

12   2010?

13   MR. SCHULTZ: The same objection with

14   respect to this as to the 30(b)(6).

15   Q.   You can answer if you know.

16   MR. SCHULTZ: Her answer will be in her

17   individual capacity.

18   You may answer.

19   A.   We do have projections. We have a

20   forecast. I don't have it handy.

21   Q.   Where would that information be

22   maintained?

23   A.   The forecast for fiscal year 2010?

24   Q.   Correct.

25   A.   That would be maintained in Lawson's

40

1   budgeting system and potentially other systems as

2   well.

3   Q.   Are records of service contracts stored

4   electronically?

5   A.   Yes.

6   Q.   In what databases are those records

7   stored?

8   A.   The contracts themselves are scanned

9   and stored in a system called Web Now. Or I

10   should say that's our way of accessing them.

11   Q.   How far back do those records go?

12   A.   I don't know.

13   Q.   How are your sales of professional

14   services to customers documented or tracked?

15   A.   The sales are documented in our

16   salesforce.com system and potentially others as

17   well.

18   Q.   What type of service revenues are

19   tracked?

20   A.   All types of service revenues.

21   Q.   Does -- where are Lawson's maintenance

22   revenues recorded?

23   MR. SCHULTZ: If it would be all right,

24   I'm going to have a continuing objection with

25   respect to revenues as not being part of the

41

1   30(b)(6).

2   MS. ALBERT: That's fine. Your

3   objection is noted.

4   A.   I don't know where maintenance revenues

5   are stored. It could be in a number of different

6   systems.

7   Q.   Are maintenance revenues tracked in a

8   manner that differs from the way that you track

9   other types of service revenues?

10   A.   Maintenance revenues are not considered

11   service revenues.

12   Q.   Does Lawson have any sort of

13   standardized pricing structure for service

14   contracts?

15   A.   Yes.

16   Q.   How are those priced?

17   A.   Lawson has a rate card, which we use

18   internally to know -- it changes, so to know what

19   our list rates are for all of the different kinds

20   of service types that we would provide.

21   MS. ALBERT: The videographer has

22   informed me that we need to take a short

23   break to change the videotape.

24   THE VIDEOGRAPHER: This marks the end

25   of videotape one in the deposition of Hannah

42

1   Raleigh. We're going to go off the record at

2   9:40.,

3   (Off the Record.)

4   THE VIDEOGRAPHER: This is videotape

5   two of Hannah Raleigh. We're back on the

6   record at 9:52.,

7   MR. SCHULTZ: Before you start, I just

8   wanted to clarify my objection with respect

9   to the 30(b)(6) 2 outside the scope

10   objection.

11   What I'm objecting to is the questions

12   that deal with revenues or pricing of the

13   Lawson systems. We just have a continued

14   objection with respect to that as outside the

15   scope of the 30(b)(6) categories.

16   Q.   Ms. Raleigh, before the break we were

17   talking about standardized pricing for service

18   contracts, and you mentioned a rate card. Can

19   you describe for me how prices are set with

20   respect to implementation and upgrade type

21   services?

22   A.   How they are set? Can you clarify the

23   question?

24   Q.   Well, does this rate card provide some

25   sort of standardized rates for implementation and

43

1   upgrade type services?

2   A.   It provides our list rates off of which

3   discounts would be calculated.

4   Q.   How do you determine if particular

5   discounts are to be accorded to a client?

6   A.   That determination is made by an

7   executive team on a customer-by-customer basis.

8   THE VIDEOGRAPHER: I'm just going to

9   make a request on the record to counsel that

10   you produce a copy of the rate card that is

11   used in connection with the pricing of

12   service contracts.

13   MR. SCHULTZ: That information has been

14   provided.

15   Q.   Do you know why revenues related to

16   gold and platinum maintenance plans are tracked

17   as services?

18   A.   When you refer to gold and platinum, I

19   believe you're referring to Lawson's managed

20   services and hosting services.

21   Q.   So under the gold level of maintenance

22   plan, can a client receive services that would be

23   included in the bronze and silver, and then in

24   addition to that -- those types of services also

25   have hosting services?

44

1   A.   Platinum we refer to hosted customers.

2   Gold would refer to the application management

3   services that we talked about earlier.

4   Q.   Do you know whether there are standard

5   prices for each level of maintenance service?

6   A.   There is a standard calculation that is

7   used to determine pricing for those different

8   levels.

9   Q.   Do you know how it is determined?

10   A.   No.

11   Q.   Do you know whether it's a percentage

12   of the license fees?

13   A.   I don't believe so.

14   Q.   With respect to clients for whom a new

15   Lawson S3 Supply Chain Management system has been

16   installed and implemented, do you know whether

17   Lawson requires a one-year initial support period

18   for that system?

19   A.   Maintenance -- obviously, maintenance

20   is a required component, as far as the initial

21   service or whatever you just said, the period. I

22   think that's a portion of the overall maintenance

23   agreement.

24   Q.   What happens if a licensee does not

25   renew maintenance? You indicated that it's a

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 1    required component.  If a licensee does not renew
 2    maintenance, does their license terminate?
 3        A.   My understanding is that they are no
 4    longer eligible to receive upgrades and support
 5    services if they do not renew their maintenance.
 6        Q.   But would they still be able to use a
 7    system that was installed at whatever version
 8    level they were currently using?
 9        A.   I'm not aware of any restrictions that
10    we put on our customers around the use of a
11    system that they purchased.
12        Q.   Do you know what percentage of Lawson's
13    overall revenues are attributable to professional
14    services?
15        A.   I don't have that number handy, but
16    that would be part of our annual filing.
17        Q.   Do you know how profits for
18    professional services are determined?
19        A.   I'm not involved in that process.
20        Q.   Do you know if there are any particular
21    costs that are allocated to providing
22    implementation services?
23        A.   Yes.
24        Q.   How would you determine the costs that
25    are allocated to providing implementation
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 1    towards the top, there is a date there, April 10,
 2    2006.  Do you recall the introduction of Lawson's
 3    managed services in 2006?
 4        A.   Yes.
 5        Q.   I think you described managed -- how do
 6    managed services differ from hosted services?
 7        A.   The primary difference would be that in
 8    managed services, the customer hosts their own
 9    physical server on their premise.
10        Q.   I think I had asked before about the
11    number of clients for which Lawson -- or the
12    number of licensees of S3 Supply Chain Management
13    applications for which Lawson provides hosted
14    services.  Were you able to find out that
15    information at the break?
16        MR. SCHULTZ:  Not at the break at this
17    time.  We have put in a request for that
18    information.
19        Q.   Do you know the identities of any
20    clients that license the S3 Supply Chain
21    Management applications for which Lawson provides
22    hosted services?
23        A.   Yes.  I'm aware of one.
24        Q.   Which client is that?
25        A.   Fayette Regional Medical Center, I
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 1    services?
 2        A.   I guess not so much related to
 3    providing the implementation services, but the
 4    cost of employing the services professionals
 5    is -- is a known cost.
 6        Q.   So the salaries associated with the
 7    individuals who provide professional services is
 8    a cost that is allocated to services?
 9        A.   Salaries and other aspects of their
10    employment with Lawson, yes.
11        Q.   Are there -- strike that.
12        Let me have the reporter mark as
13    Raleigh Exhibit 3 an article entitled Lawson
14    Professional Services Introduces Managed Services
15    and Lawson 9 Migration Program Professional
16    Services Portfolio Strengthened With New Programs
17    Designed To Help Customers Maximize The Return On
18    Their Loss And Investment.  It has Bates numbers
19    ePlus 0942090 through 95.
20        (Thereupon, Article was marked as
21        Exhibit 3 for identification.)
22        Q.   Ms. Raleigh, have you ever seen this
23    article before?
24        A.   No.
25        Q.   If you look in the -- on the right
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 1    think is what they are called.
 2        Q.   Were you involved with implementation
 3    of that system in some way?
 4        A.   I have been involved with work that
 5    they have done since they originally implemented
 6    Lawson.
 7        Q.   Do you know what applications they
 8    license?
 9        A.   I believe they license, again generally
10    speaking, Lawson's three main S3 suites of
11    applications:  So human resources, financials and
12    supply chain procurement.  There may be some
13    other products they also license that are not
14    included in those broad categories.
15        Q.   Can you turn to the third page of
16    Exhibit 3.  In the first full paragraph on that
17    page, the second sentence reads, "Lawson recently
18    launched its remote services lab developed to
19    help customers reduce the time and costs
20    associated with the migration and allow customers
21    to focus on other aspects of their business."
22        Are you familiar with the remote
23    services lab that is referred to in that
24    sentence?
25        MR. SCHULTZ:  Before you answer that,
```

Raleigh, Hannah   3/4/2010 12:00:00 AM

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1   Lawson will object to Exhibit 3 as lack of

2   foundation and hearsay.

3   A.   I would need to refer back. I need to

4   read back through this to know exactly what they

5   are referring to at that time.

6   Q.   Why don't you go ahead and review the

7   document if that would help you.

8   A.   Thank you. Yes. I'm familiar with the

9   remote services lab.

10   Q.   What is that remote services lab?

11   A.   That was a program that we initiated to

12   provide customers with a remote delivery option

13   for upgrading their loss in applications during a

14   period where we had a large number of customers

15   who needed to do upgrades.

16   Q.   You referred to that program in the

17   past tense. Does Lawson still offer that remote

18   services lab?

19   A.   I don't believe so. We do provide

20   remote services for a variety of different

21   reasons, but I don't believe that that offering

22   is still active at this time.

23   Q.   Do you see in the sentence that we were

24   referring to the term "migration"?

25   A.   Uh-huh.

50

1   Q.   Do you have an understanding of what

2   that term means?

3   A.   Yes.

4   Q.   What is meant by the term "migration"?

5   A.   In this context migration is referring

6   to the movement of a customer's data from one

7   application or environment level to the next

8   application or environment level. So it's an

9   upgrade, essentially.

10   Q.   What types of services would be

11   involved in the migration project?

12   A.   In this setting, primarily what they

13   are referring to is the system's consulting, the

14   actual running of the migration programs that

15   move the data and reorganize it to work in our

16   newer version.

17   Q.   In the next paragraph, there is a

18   reference to the Lawson 9 migration program. Do

19   you see that?

20   A.   Yes.

21   Q.   To what does that refer?

22   A.   That is the same migration. It is the

23   migration of data, upgrade, essentially, of data

24   from prior versions to version 9.

25   Q.   And the Lawson professional service

51

1   organization would provide services to its

2   clients to assist them with upgrading from one

3   version of a system to the next release version

4   of that system; is that correct?

5   A.   To some customers, yes.

6   Q.   If the customer paid the fees

7   associated with such a project, would Lawson

8   provide those services?

9   A.   Yes.

10   Q.   Let me have the reporter mark as

11   Raleigh Exhibit 4, a copy of a press release

12   entitled Lawson Software Introduces Lawson Online

13   Learning Suites, bears production numbers

14   L0066191 through 193.

15   (Thereupon, Press Release was marked as

16   Exhibit 4 for identification.)

17   Q.   Ms. Raleigh, have you ever seen the

18   press release that has been marked as Raleigh

19   Exhibit 4 before?

20   A.   No.

21   Q.   Does it appear to be a Lawson press

22   release?

23   A.   Yes.

24   Q.   Does Lawson maintain copies of press

25   releases of this type on the Lawson.com website?

52

1   A.   Yes.

2   Q.   Do you see at the bottom of the page

3   there is a URL down there?

4   A.   Yes.

5   Q.   Do you know from what website -- or to

6   what website that URL is a reference?

7   A.   No.

8   Q.   Are you familiar with any site referred

9   to as PHX.corporate?

10   A.   No.

11   Q.   Do you have any reason to believe that

12   this is not a Lawson press release?

13   A.   I haven't read the whole thing, but no,

14   not from my initial review.

15   Q.   Do you recall Lawson's introduction of

16   online learning suites in April of 2009?

17   A.   Just a point of clarification, this is

18   new Lawson online learning suites. This was not

19   a net new offering in 2009.

20   Q.   So prior to 2009 Lawson had offered

21   online learning suites of some sort?

22   A.   Yes.

23   Q.   Do you know what the new online

24   learning suites, are those referred to by the

25   four bullet points in the middle of the page?

53

1 A. Yes.

2 Q. So within Lawson's online learning

3 suites offering, it has an on demand collection

4 of courses; is that correct?

5 A. That's correct.

6 Q. And it has a simulation collection of

7 courses; is that correct?

8 A. Yes.

9 Q. And these simulation collections of

10 courses, do they simulate the operations of

11 actual Lawson applications?

12 A. Yes.

13 Q. Do you know whether there are any

14 simulation collections that relate to the S3

15 Supply Chain Management suite?

16 A. I believe so.

17 Q. Are there any courses in the simulation

18 collection that relate to the S3 Supply Chain

19 Management procurement applications?

20 A. That's the same as the prior question,

21 I believe. I believe so. I haven't used them

22 myself.

23 Q. Then also within these online learning

24 suites, Lawson offers an interactive webcast

25 collection; is that correct?

55

1 Q. Do you know how the fees are

2 determined?

3 A. They are different subscription

4 methods. There is the ability for a customer to

5 use them on a one-by-one basis. So pay as you

6 go, if you will. Or the ability for a customer

7 to purchase a one-year subscription to anything

8 included in the library.

9 Q. Let me have the reporter mark as

10 Raleigh Exhibit 5 a document entitled S3 Online

11 Learning Suite bearing production numbers

12 L0133903 through 906.

13 (Thereupon, S3 Online Learning Suite

14 was marked as Exhibit 5 for

15 identification.)

16 Q. Are you familiar with the document that

17 has been marked as Raleigh Exhibit 5?

18 A. I haven't seen it before.

19 Q. Do you know whether Lawson maintains --

20 does this appear to be a standardized type of

21 document utilized by Lawson?

22 A. Yes.

23 Q. What type of document is it?

24 A. I don't know if we call them white

25 papers or brochures.

54

1 A. Yes.

2 Q. And then Lawson also offers a virtual

3 lab collection; is that correct?

4 A. Yes.

5 Q. What is the difference between the

6 courses and the virtual lab collection versus the

7 simulation collection?

8 A. The simulation collection would be --

9 let me see the best way to describe it -- sort of

10 like recorded or -- they are simulations of

11 business processes performed and captured for the

12 purpose of training a student versus a virtual

13 lab, which would be more like an instructor led

14 training opportunity.

15 Q. Would the virtual lab courses offer

16 students the capability of interacting in a live

17 manner with a simulation system or --

18 A. There would be live interaction with

19 the instructor. Whether or not they use a

20 simulation system for the virtual lab, I'm not --

21 I don't know.

22 Q. And does Lawson charge fees in

23 connection with the various courses offered under

24 these four collections of courses?

25 A. Yes.

56

1 Q. To whom does Lawson distribute

2 documents of this type?

3 A. This type of document would be

4 available to customers on Lawson.com typically.

5 Q. And if you could turn to page -- the

6 second and third page of this document. Do you

7 see there a heading On Demand Collection,

8 Simulation Collection, Interactive Webcast

9 Collection and Virtual Lab Collection?

10 A. Yes.

11 Q. So these are the four collections of

12 courses that were referenced in Exhibit 4; is

13 that accurate?

14 A. Yes.

15 Q. Do you know how many courses there are

16 in the on demand collection that would relate to

17 the S3 Supply Chain Management suite?

18 A. I don't know.

19 Q. Do you know whether there are indeed

20 courses within that collection that relate to the

21 Supply Chain Management suite?

22 A. Yes.

23 Q. Do you know whether there are courses

24 in each of the other three collections that

25 relate to the S3 Supply Chain Management suite?

57

1   A.   I am fairly certain that there are in
2   each of those categories.
3   Q.   Let me have the reporter mark as
4   Raleigh Exhibit 6 a document entitled Learned In
5   Real Time Virtual Learning Labs. It bears
6   production numbers L0134023 through 30.
7   (Thereupon, Learned In Real Time
8   Virtual Learning Labs was marked as
9   Exhibit 6 for identification.)
10   Q.   Are you familiar with the document that
11 has been marked as Raleigh Exhibit 6?
12   A.   No.
13   Q.   Do you know -- does the document marked
14 as Raleigh Exhibit 6 appear to be a standardized
15 type of document used in Lawson's business?
16   A.   Yes.
17   Q.   What type of document is Exhibit 6?
18   A.   I would call it a course catalog.
19   Q.   And to whom does Lawson make available
20 course catalogs of the type illustrated in
21 Exhibit 6?
22   A.   Our customers.
23   Q.   Does Lawson maintain copies of course
24 catalogs of the type illustrated in Exhibit 6 on
25 its website, Lawson.com?

58

1   A.   I don't believe so.
2   Q.   How are course catalogs of this type
3   distributed to customers?
4   A.   I believe they are distributed on my
5   Lawson.com.
6   Q.   Who has access to my Lawson.com?
7   A.   Our customers and our employees and
8   potentially our third party partners as well.
9   I'm not sure about that.
10   Q.   Are you familiar with the course
11 offerings that would be referred to as Lawson
12 virtual learning labs?
13   A.   Yes.
14   Q.   Is this another type of training course
15 that Lawson offers to its customers?
16   A.   Yes.
17   Q.   Are virtual learning labs the same
18 thing that was referred to in the prior two
19 exhibits as the virtual lab collection?
20   A.   I believe so.
21   Q.   Can you turn to page 5 of Exhibit 6.
22 That has the Bates number ending with 27. Do you
23 see at the top of the page there is a course
24 entitled Inventory Control, 8.1/9.0X?
25   A.   Yes.

59

1   Q.   So is that a course that Lawson offers
2   to its customers?
3   A.   Yes.
4   Q.   And the text under that course title
5   indicates that this is a two-day course that
6   provides instructions on the key setup components
7   and processing functionality of the inventory
8   control application. The key setup components
9   deal with both company structural elements and
10 with item related setup. Do you see that?
11   A.   Yes.
12   Q.   So does the training offered by Lawson
13 in this course include training to its customers
14 on how to set up the item master associated with
15 the inventory control application?
16   A.   Yes. I think that's a fair deduction.
17   Q.   What is meant by the term item related
18 setup?
19   A.   This would likely refer to all of the
20 setup parameters in Lawson required to add an
21 item to the item master.
22   Q.   Can you turn to the next page of
23 Exhibit 6. Do you see on that page the course
24 entitled Procurement Attributes 8.1 and 9.0?
25   A.   Yes.

60

1   Q.   The description of that course is that
2   it is a one-day course that identifies the
3   available procurement attributes in application
4   release 8.1 and 9.0 that includes hands-on
5   exercises for creating and using a user-defined
6   attribute, as well as a Lawson procurement
7   attribute.
8   Do you know what is meant by the term
9   "user defined attribute" there?
10   A.   I don't know specific to this course.
11   Q.   Do you have any understanding as it
12 would relate to Lawson's procurement
13 applications?
14   A.   No. I can tell you that Lawson has
15 attribute -- user defined attributes in other
16 areas of the system that are defined by the
17 customer, depending upon what they would want to
18 track.
19   Q.   Do you know what is meant by the use of
20 the term "hands-on exercises"?
21   A.   Yes.
22   Q.   What is meant by that term?
23   A.   Typically, that means that the customer
24 participating in this training opportunity has
25 the ability to try out a particular piece of

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1 functionality, attempt to do whatever it is that
2 we are teaching them how to do.
3   Q.   That would include use of a procurement
4 system in connection with that course?
5   A.   It would include use of Lawson's
6 training system.
7   Q.   And does Lawson's training system have
8 the procurement applications installed?
9   A.   Yes.
10   Q.   Do you see the course entitled
11 Requisition Self Service 8.1/9.0 on that page?
12   A.   Yes.
13   Q.   And the description of that course is
14 that it introduces the major features of
15 requisitions -- requisition self-service, such as
16 requisition approvals, receiving, and the
17 "shopping experience," which includes searching
18 the catalog for items, using shopping lists,
19 ordering specials or services and ordering
20 categories. And it further indicates that this
21 course provides hands-on exercises on the
22 shopping experience.
23   So would it be correct, then, that the
24 course offered by Lawson enables its customers to
25 have an experience using a Lawson demonstration

62

1 system that would have the requisition
2 self-service application installed?
3   A.   A training system, yes.
4   Q.   What is the difference between a
5 demonstration system and a training system?
6   A.   We use a demonstration system to
7 demonstrate our products to customers in a sales
8 cycle. A demonstration could be configured
9 differently, uniquely to a prospect's interests
10 or desires.
11   Whereas, a training system would be
12 defined solely for the purpose of training
13 customers of all different types and all
14 different interests.
15   Q.   Where are -- where are hands-on
16 courses, such as the two that we have been
17 referring to, where are those courses offered?
18   A.   These courses are offered remotely or
19 virtually, so they are -- they happen in
20 cyberspace, I guess.
21   Q.   So how does a client access these
22 courses?
23   A.   By a webex or URL of some sort and the
24 telephone, likely a telephone.
25   Q.   Does a client have to schedule these

63

1 courses in advance or are these on demand type
2 courses?
3   A.   These particular courses, I believe,
4 are scheduled in advance or registered for.
5   Q.   Does Lawson maintain recordings of any
6 prior offerings of these courses?
7   A.   I don't know.
8   Q.   The course below the Requisition Self
9 Service course is entitled Requisitions 8.1/9.0.
10 Do you know what the difference between that
11 course and the Requisition Self Service course
12 is?
13   A.   Yes.
14   Q.   What would be the difference between
15 those two courses?
16   A.   They are two different products in
17 Lawson's offering.
18   Q.   So the Requisitions course would be
19 directed to the requisitions application, and
20 then the Requisition Self Service course would be
21 specific to that requisition self service
22 application?
23   A.   That's correct.
24   Q.   Let me have the reporter mark as
25 Raleigh Exhibit 7, a document entitled Answer

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1 Detail, the Proposal Automation Suite, bears
2 production numbers LE00352046 through 2342.
3   (Thereupon, Answer Detail was marked as
4   Exhibit 7 for identification.)
5   MS. ALBERT: I'm building muscles in
6   this case.
7   Q.   Before we get to Exhibit 7,
8 Ms. Raleigh, can you describe the process which
9 Lawson would use to -- pursuant to which Lawson
10 could be awarded a contract for the procurement
11 modules of the S3 Supply Chain Management suite?
12   A.   The process differs from prospect to
13 prospect.
14   Q.   Would a prospective client typically
15 issue a request for proposal?
16   A.   Sometimes.
17   Q.   Do you know in approximately how many
18 circumstances the process would be initiated by a
19 request for proposal?
20   A.   I don't know offhand.
21   Q.   What are the other means by which the
22 process would be initiated, other than a request
23 for proposal issued by a prospect?
24   A.   It could be a direct, you know,
25 discussion between a customer and a

65

1   representative of Lawson in which they indicate
2   their desire to learn more about Lawson. It
3   could be a trade show contact. It's a variety of
4   ways in which customers could indicate they
5   wanted to work with us.
6   Q.   Are you or have you over the course of
7   your career at Lawson been involved with drafting
8   responses to requests for proposal?
9   A.   Indirectly, not directly.
10   Q.   In what indirect manner have you been
11   involved with requests for proposals?
12   A.   At times the people who are directly
13   responsible for answering those RFPs have
14   validated their answers to certain questions with
15   me based on my experience.
16   Q.   Are you familiar with the process that
17   the individuals who are directly responsible for
18   drafting RFP responses do so?
19   A.   A technical process? Is that what
20   you're referring to?
21   Q.   I just want to know at a high level how
22   Lawson goes about drafting responses to RFPs.
23   MR. SCHULTZ: With respect to this line
24   of questioning on the RFPs, in drafting
25   response us to RFPs, this is not a part of

66

1   the topics for the 30(b)(6), but you may ask
2   the questions in her individual capacity. We
3   object to this as to outside the scope of the
4   30(b)(6).
5   A.   In my individual capacity, I would say,
6   no, I don't have -- I don't have a specific
7   knowledge of how that process works.
8   Q.   Who's responsible for drafting RFP
9   responses?
10   A.   A variety of different people,
11   depending on the subject of the RFP. So, for
12   instance, if the RFP includes product or also
13   includes a request for a proposal of services,
14   there might be two different teams of people who
15   would work on it or collaborate on it.
16   Q.   So in connection with implementation
17   projects in which you have been involved, who has
18   responsibilities for drafting Lawson's RFP
19   responses for those projects?
20   A.   For the implementation portion?
21   Q.   Yes.
22   A.   We have a -- are you looking for a
23   specific person's name or for a group?
24   Q.   Well, first let's start at the group
25   level. What group has responsibilities for that?

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1   A.   Our business development group.
2   Q.   Within that business development group,
3   who would have responsibilities in the area of
4   the S3 Supply Chain Management suite?
5   A.   There are a number of different people
6   in that group, all of whom would be capable of
7   responding to an RFP, that would include S3
8   Supply Chain Management products.
9   Q.   Who are those people?
10   A.   Alan Wordsworth, Tim Nicholson, Karen
11   Bruschke, Charlie Phillips and Steve Christensen.
12   Q.   What is Mr. Wordsworth's position?
13   A.   Business development manager.
14   Q.   Does he have responsibilities for any
15   particular industry vertical or product line?
16   A.   Healthcare.
17   Q.   What is Mr. Nicholson's position?
18   A.   Client solutions executive.
19   Q.   Does he have responsibilities for any
20   particular industry vertical or product line?
21   A.   Healthcare.
22   Q.   What is Ms. Bruschke's position?
23   A.   It's the same for all of them, client
24   service executive or client solutions executive
25   in healthcare.

68

1   Q.   You indicated that these individuals
2   have responsibility for preparing sections of
3   responses to RFPs that relate to professional
4   services.
5   Are there other individuals who have
6   responsibilities for preparing the portions of
7   RFP responses that relate to the technical or
8   functional aspects of the applications that are
9   going to be involved in the project?
10   A.   Yes.
11   Q.   What is the general business group that
12   such individuals come from or are in?
13   A.   I don't know exactly what they call the
14   group, but it's the solutions consultants and the
15   solution consulting manager.
16   Q.   Are there particular individuals who
17   have responsibility for reviewing responses to
18   requests for proposal that are prepared prior to
19   their dissemination to the prospect?
20   A.   I don't know if there are specific
21   people with that job.
22   Q.   Do you know if the responses to RFPs
23   undergo a legal review prior to release?
24   A.   I believe they do.
25   Q.   Who is responsible for determining the

69

1 pricing that Lawson proposes to a prospective

2 client?

3   **A.   A team of people. For services or for**

4 **the products?**

5   Q.   Well, let's start with services. Who

6 is responsible for determining the pricing of the

7 services for a particular prospect?

8   **A.   It would be a team that would include**

9 **my manager, the VP of healthcare delivery. It**

10 **could also include the general manager of**

11 **healthcare. It would also include the business**

12 **development manager and the client solutions**

13 **executive and to a certain extent the practice**

14 **director, like myself.**

15   Q.   Does each industry vertical have

16 responsibilities for pricing its own service

17 offerings for bids on potential contracts?

18   **A.   All guided by the same rate card that**

19 **we referred to earlier, but, yes, each vertical**

20 **would have their own team associated with their**

21 **customer, their prospects.**

22   Q.   How is an account executive assigned

23 for a particular response to an RFP and

24 subsequent project if a contract is awarded?

25   **A.   Somewhat based on region or territory.**

70

1   Q.   Are there particular account executives

2 that deal with specific industry verticals?

3   **A.   Yes.**

4   Q.   And then within those verticals,

5 specific account executives have responsibilities

6 for specific territories?

7   **A.   Yes.**

8   Q.   So within the healthcare vertical, what

9 would be the various account executives and their

10 different regions?

11   **A.   You're looking for actual names?**

12   Q.   Yes.

13   **A.   I would probably need to refer to an**

14 **org chart to be able to give it to you exactly**

15 **and a territory chart.**

16   Q.   Do you know in your region the

17 different account executives?

18   **A.   Yes. We have -- we have certain**

19 **account executives that sell to prospects. We**

20 **have a different group of account executives that**

21 **sell to existing customers. So I'm struggling a**

22 **little bit with what group you're actually asking**

23 **about.**

24   Q.   So what account executives are

25 responsible for selling to prospects within your

71

1 region?

2   **A.   Pat Heyman.**

3   Q.   Any others?

4   **A.   Jay Fogarty. I think that's it.**

5   Q.   What about account executives who have

6 responsibility for selling to existing clients

7 within your region, who would those individuals

8 be?

9   **A.   Brett Weiss, Brian Walker, Frits**

10 **Hoffman, Zak Kauss, Megan Evans, Mike Riley. I'm**

11 **trying to think if I have forgotten anybody. I**

12 **think that's it.**

13   Q.   Now, with respect to Raleigh Exhibit 7,

14 are you familiar with something referred to as

15 the proposal automation suite?

16   **A.   No.**

17   Q.   Are you familiar with a database or a

18 repository of standard answers to RFP questions?

19   **A.   I'm aware of it. I'm not familiar with**

20 **it.**

21   Q.   Do you know if the document marked as

22 Raleigh Exhibit 7 was produced from the

23 repository of standardized answers to RFP

24 questions?

25   **A.   I don't know.**

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1   Q.   Within the database of standardized RFP

2 responses that you're familiar with, do you know

3 who prepared the answers to those questions?

4   **A.   No.**

5   Q.   Do you know who is responsible for

6 maintaining the information in that database?

7   **A.   No.**

8   Q.   Can you turn to page 30 of Exhibit 7.

9 That's on the page with the Bates number ending

10 2075. Under the heading Services, do you see

11 there is a listing for consulting, and then there

12 is a listing for total services.

13   Do you know what the difference is

14 between revenues that would be attributable to

15 consulting versus total service revenues?

16   MR. SCHULTZ: Before you answer, I will

17 object to this as lack of foundation with

18 respect to this document, Exhibit 7.

19   THE WITNESS: Do you want me to answer?

20   MR. SCHULTZ: You may answer.

21   **A.   My -- I believe that this would -- that**

22 **the total services would include both the**

23 **business consulting and systems consulting we**

24 **referred to earlier and also learning services.**

25 **There may be other types of revenue also included**

73

1   in there. But that's --

2   Q.   Can you turn to the next page of the

3   document. Do you see on that page there are some

4   percentages of Lawson's total revenues, and they

5   are broken out by revenues attributable to

6   license fees, revenues attributable to

7   maintenance and revenues attributable to

8   consulting.

9   Do you know what percentage of Lawson's

10   total revenues were attributable to consulting

11   services for fiscal year 2009?

12   A.   I don't have that at my fingertips.

13   Q.   Do you have any kind of estimate for

14   the range?

15   A.   I would guess it's probably consistent

16   with the numbers that are on the page.

17   Q.   Can you turn to page 44 of the

18   document. That's on the page that the Bates

19   number ends with 2089.

20   There is a question on that page

21   related to third-party requirement for

22   implementation. And the answer below the first

23   sentence indicates that Lawson does not require

24   that you work with third parties for

25   implementation.

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1   The next sentence indicates that Lawson

2   does have service partners who are certified to

3   provide specialized consulting and implementation

4   services.

5   Do you see that?

6   A.   Yes.

7   MR. SCHULTZ: What page are you on?

8   I'm sorry.

9   MS. ALBERT: On page 44.

10   MR. SCHULTZ: Thank you.

11   Q.   Do you know for what percentage of

12   implementation Lawson provides the implementation

13   services versus third parties?

14   A.   It depends on the type of

15   implementation.

16   Q.   What do you mean by that?

17   A.   Upgrade versus new implementation

18   versus an add on, you know, a small project to

19   add on another suite to an existing customer. It

20   would depend.

21   Q.   With respect to new installation type

22   implementations, for what percentage of those

23   projects does Lawson provide the services versus

24   third parties?

25   A.   Are we specifically referring to supply

75

1   chain implementations?

2   THE COUR REPORTER: I didn't hear you.

3   A.   Are we specifically referring to supply

4   chain implementations or any implementation?

5   Q.   Well, if you know the information with

6   respect to supply chain implementations, let's

7   just go directly to that. For what percentage of

8   new installations in the Supply Chain Management

9   area does Lawson provide the services versus

10   third parties?

11   A.   I don't know.

12   Q.   What about just in general for any type

13   of new installation of Lawson applications, for

14   what percentage of those projects does Lawson

15   provide the services versus third parties?

16   A.   80 to 85 percent.

17   MS. ALBERT: And the videographer has

18   indicated that we need to take a short break

19   to change the tape.

20   THE VIDEOGRAPHER: This is the end of

21   videotape two in Hannah Raleigh. We're going

22   to go off the record at 10:50.,

23   (Off the Record.)

24   THE VIDEOGRAPHER: This is videotape

25   two of Hannah Raleigh. We're on the record

76

1   at 10:58.,

2   MS. ALBERT: Just for point of

3   clarification, is this videotape number

4   three?

5   THE VIDEOGRAPHER: I'm sorry. This is

6   videotape number three.

7   Q.   Ms. Raleigh, over the break were you

8   able to find out the answers to any of the

9   pending questions that we had outstanding?

10   A.   Yes.

11   Q.   Were you able to find out the answer to

12   the question about how many supply chain

13   management systems went live within the last 12

14   months?

15   A.   Yes. The answer is 13.

16   Q.   Do you know any of the clients

17   associated with those systems?

18   A.   I do.

19   Q.   What are the clients that you're

20   familiar with?

21   A.   Jackson Memorial Hospital, Appalachian

22   Regional healthcare system, Suny Downstate

23   Medical Center. Those are the three that I'm

24   most familiar with.

25   Q.   And were you able to find out the

77

1   answer to the question concerning the number of

2   Supply Chain Management systems for which Lawson

3   provides hosted or managed services?

4   A.   Yes.

5   Q.   How many is that?

6   A.   13 total.

7   Q.   Are you aware of the identities of any

8   of the clients for which Lawson provides those

9   services?

10   A.   I didn't ask for that information.

11   Q.   Are you, just in your own individual

12   capacity, aware of any clients for which Lawson

13   provides hosted services that have systems in the

14   Supply Chain Management area?

15   A.   The one that I gave previously, Fayette

16   Regional Medical Center.

17   MR. SCHULTZ: I just object to that as

18   vague, because the first question was hosted

19   and managed and this question was just

20   hosted. Just to clarify that.

21   Q.   Is the system -- are the services that

22   Lawson provides to Fayette in the nature of

23   hosted services?

24   A.   Yes.

25   Q.   Turning back to Exhibit 7. Could you

78

1   turn to page 196 of that document. There is a

2   question on that page that relates to integrate

3   business process and implementation. And under

4   the answer it indicates that -- there is a

5   bullet --

6   Well, first of all, the answer states

7   that "Lawson's general approach to interfaces,

8   integration and data conversion is as follows:

9   During the implementation process, if interfaces,

10   integration or data conversions are required,

11   Lawson professional services consultants consider

12   the nonLawson applications abilities for

13   exporting and importing data, what condition the

14   data from/to the nonLawson system would be in

15   upon interfacing with Lawson, and if any changes

16   need to be made to that format, and in what time

17   frame the data transfers would need to occur

18   (real time or batch)."

19   Further down in the answer it indicates

20   that "interface, integration and conversion

21   options/tools may include but are not limited

22   to," and the first bullet states that Lawson has

23   native import/export utilities for a number of

24   its applications that can be utilized for data

25   conversion, interfaces or integration."

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1   Do you know if there are native

2   import/export utilities that are included in the

3   S3 procurement applications?

4   A.   Yes.

5   Q.   Are there?

6   A.   Yes.

7   Q.   Such utilities? Are there

8   import/export utilities associated with Lawson's

9   S3 inventory control application?

10   A.   Yes.

11   Q.   Are there import/export utilities that

12   are native to Lawson's S3 purchase order

13   application?

14   A.   I don't know.

15   Q.   What is the native import/export

16   utility that is associated with Lawson's S3

17   inventory control application, do you know?

18   A.   I don't know the name or number of the

19   form, but there is an import utility for the

20   loading of an item master into Lawson.

21   Q.   Below that bullet, the next bullet

22   states, "All Lawson forms have their own APIs

23   that can be accessed by a common tools, such as

24   Microsoft Excel for data extraction and upload,

25   either on a one-time conversion basis or on an

80

1   ongoing interface/application basis."

2   Do you know whether Lawson forms that

3   are associated with the S3 procurement

4   applications have APIs of this nature?

5   A.   Yes.

6   Q.   Yes, they do have such APIs?

7   A.   Yes, they do.

8   Q.   The four letter bullet point states

9   that "for the most robust conversion and

10   integration requirements, Lawson offers a

11   disparate data integration tool known as process

12   flow integrator."

13   Do you know whether that tool -- or can

14   this process flow integrator tool be used for

15   data conversion from a legacy system to a newly

16   installed Lawson S3 procurement system?

17   A.   Probably could. But I haven't

18   experienced that.

19   Q.   Have you had experience with the native

20   import/export utilities for data conversion that

21   are included in the S3 procurement applications?

22   A.   Yes.

23   Q.   Have you had experience with the one

24   that you mentioned that relates to loading the

25   item master database?

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1   A.   I have experience with customers who
2   have used that, yes.
3   Q.   The last bullet point on that page
4   indicates that "Lawson data validation rules
5   apply for every transaction as they would for an
6   online entry."
7   Does Lawson provide data validation
8   rules for data conversions from legacy systems to
9   newly installed Lawson S3 procurement systems?
10   A.   I'm not sure I would say that we
11   provide the rules, but the rules are part of the
12   software.
13   Q.   So can you describe functionally any
14   data validation rules that apply or that are a
15   part of the software with respect to S3
16   procurement applications?
17   A.   I could give an example.
18   Q.   What is an example?
19   A.   An example might be a required
20   character length. So a character -- a field must
21   be nine characters. And if we attempt to import
22   10, the rule would prevent that data from being
23   brought into the system.
24   Q.   Does Lawson provide instructions or
25   training to its clients to familiarize them with

83

1   business process that is somehow impacted by the
2   software.
3   Q.   This answer also indicates that "the
4   Lawson knowledge base includes documentation
5   topics." Can you describe what is meant by the
6   term "documentation topics"?
7   A.   I don't know specifically what that is
8   meant to refer that is unique in this list.
9   Q.   This also indicates that the knowledge
10   base includes procedures. Do you know what types
11   of documentation is made available by Lawson on
12   the knowledge base that would be referred to as
13   procedures?
14   A.   It could be procedures for executing a
15   particular function in the software, procedures
16   for running a report.
17   Q.   The next page continues some other
18   types of documentation that is included in the
19   knowledge base, including how-to guidelines. Can
20   you describe what is meant by that term?
21   A.   Again, I don't know how that is unique
22   from the previous. But there is in the knowledge
23   base some documents that would help a customer
24   determine how to set something up or how to
25   accomplish a particular function.

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1   the data validation rules that would apply with
2   respect to Lawson's S3 procurement applications?
3   A.   Yes. We have conversion workbooks, so
4   documentation, whether or not we provide services
5   or training, it would depend.
6   Q.   Can you turn to page 204 of the
7   exhibit, and the Bates number on that page ends
8   with 2249.
9   A.   Yes.
10   Q.   Do you see answer number 290, the
11   question there asks, "Do you provide an online
12   knowledge base?"
13   And below that the answer indicates
14   that "the Lawson knowledge base offers customers
15   a single point of access to a comprehensive
16   collection of Lawson products specific
17   knowledge."
18   And the fourth bullet point indicates
19   that "documents on the knowledge base include
20   background concepts." Do you see that?
21   A.   Yes.
22   Q.   What is -- what are background
23   concepts?
24   A.   I don't know specifically what this
25   refers to. A background concept could refer to a

84

1   Q.   Then the next type of documentation is
2   referred to as "year end manuals." Do you know
3   what is meant by that term?
4   A.   Yes. There are certain portions of the
5   software that have specific year-end procedures,
6   most commonly this is payroll related. So this
7   might refer to manuals that teach a customer or
8   document what a customer must do at year end with
9   the software.
10   Q.   This answer indicates "The knowledge
11   base further includes something referred to as
12   release notes." Do you know what is meant by the
13   term "release notes"?
14   A.   Yes.
15   Q.   What does that mean?
16   A.   Release notes are typically
17   documentation of either a patch or a new release
18   of the software, new version.
19   Q.   Below that the answer indicates that
20   "File layouts are made available in the knowledge
21   base." Do you know what is meant by the term
22   "file layouts"?
23   A.   Yes.
24   Q.   What is meant by that?
25   A.   File layouts typically refer to the --

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1   such as the conversion guides we talked about
2   earlier that would tell a customer in what format
3   a file must be in order to be uploaded into
4   Lawson or what file or format it would be in if
5   it were exported from Lawson.
6   Q.   The document also indicates that "The
7   knowledge base includes program changes, database
8   changes, supports frequently asked questions."
9   And then the last entry there is "error
10   messages."
11   Do you know what types of documentation
12   in the nature of error messages are included in
13   the knowledge base?
14   A.   Yes. Often Lawson's software produces
15   an error message when something doesn't happen
16   appropriately, and customers will use the
17   knowledge base to search for an error message to
18   understand what that error message may mean.
19   Q.   Are there any other types of
20   documentation that you're aware of that would be
21   included in the knowledge base, other than those
22   listed in Exhibit 7?
23   A.   None that I can think of.
24   Q.   Are customers entitled to access the
25   Lawson knowledge base as part of their license

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1   is supposed to do.
2   Q.   What happens once the case is logged
3   with online support?
4   A.   A support center employee responds to
5   it and works with the customer.
6   Q.   Is that type of service specific to a
7   specific level of support or is that offered with
8   the basic level of support?
9   A.   It's offered with the basic level of
10   support.
11   Q.   The next bullet refers to something
12   called "case management." Do you know what types
13   of services fall under that heading?
14   A.   Yes.
15   Q.   Can you describe for me?
16   A.   This would allow a customer to see what
17   cases they have open, get updates on the status
18   of those cases, close cases.
19   Q.   The next type of service is referred to
20   as "user setup and security." Are you familiar
21   with the nature of those types of services?
22   A.   I believe so.
23   Q.   What is your understanding of those
24   types of services?
25   A.   I believe this specifically refers to

86

1   fees?
2   A.   I don't believe so.
3   Q.   How does a customer obtain access to
4   the Lawson knowledge base?
5   A.   I believe it is a part of your
6   maintenance fees.
7   Q.   Can you turn to page 207 of the
8   exhibit. Answer number 295 relates to the types
9   of online support services.
10   And the next page provides the answer
11   that "Lawson provides online support through our
12   customer website support.Lawson.com."
13   And the types of online support include
14   the Lawson knowledge base that we were discussing
15   earlier.
16   The next item is referred to as case
17   reporting. Are you familiar with that type of
18   service?
19   A.   Yes.
20   Q.   What is the nature of that type of
21   service?
22   A.   This would enable a customer to report
23   call in or -- not call in, but use the online
24   tool to log a case with our support organization
25   when they feel the software isn't doing what it

88

1   the setup of users of the customer
2   support.lawson.com. portal, if you will, and the
3   security associated with each user.
4   Q.   The next bullet point indicates that
5   "product downloads are available through
6   support.Lawson.com."
7   The bullet after that refers to "Lawson
8   community." Are you familiar with what is meant
9   by the term "Lawson community"?
10   A.   Somewhat.
11   Q.   What is your understanding of those
12   services?
13   A.   This provides a forum in which our
14   customers can interact with one another.
15   Q.   Then the final bullet refers to "Lawson
16   interactive support." Are you familiar with
17   those types of services?
18   A.   Yes.
19   Q.   What is the nature of those types of
20   services?
21   A.   That is what I was referring to under
22   the case reporting. That's what happens after a
23   case is reported interactively, and the customer
24   will work with the support person on their case.
25   Q.   With respect to that interactive

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1 communication, is that via telephone, via e-mail

2 or a multiple means of communication?

3   A.   It could involve different means, but

4 most purely this would be interactive support

5 live chat or, you know, it's via the Internet.

6   Q.   Do Lawson support services personnel

7 ever log on to a client system remotely to try to

8 assess problems?

9   A.   Yes.

10   Q.   And is there a particular level of

11 support services that a client needs to subscribe

12 to in order to have these types of remote access

13 support services provided?

14   A.   No.

15   Q.   Does that come with the basic level of

16 support?

17   A.   I believe so, yes.

18   Q.   Is there anywhere where documentation

19 is maintained concerning these case reports or

20 trouble tickets or the provision of this

21 interactive support?

22   A.   I believe that all of the transcripts

23 of all of those support cases are maintained in

24 the system.

25   MS. ALBERT: Counsel, we would ask that

90

1 Lawson produce copies of case reports and

2 documentation relating to interactive support

3 services provided and remote services

4 provided with respect to clients who had S3

5 procurement type systems.

6   MR. SCHULTZ: I will look into that.

7 We will produce that if we have that.

8   MS. ALBERT: Thank you.

9   Q.   Can you turn to page 212 of the

10 exhibit. The question on this page relates to

11 other types of support. There is a heading

12 related to on-site support.

13   And it indicates that "Lawson provides

14 on-site support on a billable basis from the

15 global support center and Lawson's professional

16 services group at the current prevailing rates."

17   Do you know for what percentage of

18 customers Lawson provides on-site support

19 services of this nature?

20   A.   I don't know.

21   Q.   Do you see further down that page there

22 is a heading entitled Post Live Implementation

23 Support?

24   A.   Yes.

25   Q.   And under that heading the first

91

1 sentence reads, "To ensure a smooth

2 implementation, Lawson can provide go live and

3 post live support."

4   Do you know for what percentage of

5 customers Lawson provides go live and post live

6 support services?

7   A.   I would refer back to the earlier

8 statement that Lawson provides between 80 and 85

9 percent of our new initial customer

10 implementation with some services that could

11 include go live or post live services.

12   Q.   What is meant by the term "go live

13 services"? Can you describe the nature of those

14 services?

15   A.   Typically, those services would -- it

16 could entail a number of different types of

17 consulting, but its presence during the

18 customer's initial turnup of the software in a

19 support capacity.

20   Q.   And what type of services are provided

21 under the heading Post Live Support?

22   A.   Typically, this is referring to ongoing

23 support of customer's live operations during the

24 first several times they attempt to do something.

25   So the example they give here is the

92

1 first month end or the first quarter end, we

2 might provide services at that time. That could

3 be considered post live services.

4   Q.   Can you turn to page 238 of the

5 exhibit. There is an answer number 344 on that

6 page where the question asked, "Is a conversion

7 tool provided for upgrades?"

8   The answer indicates, "Lawson delivers

9 data conversion utilities for upgrading the

10 application from one release to the next. We

11 recommend that Lawson professional services be

12 involved for a major upgrade."

13   Why does Lawson recommend that Lawson

14 professional services be involved with a major

15 upgrade and conversion services involved in such

16 upgrades?

17   A.   I would say we recommend it because of

18 the risk to the customer's production environment

19 involved in doing an upgrade.

20   Q.   How does having a Lawson professional

21 services, you know, personnel involved in that

22 project facilitate or diminish the risks involved

23 with that upgrade?

24   A.   We have experience performing upgrades

25 that would probably exceed that of our customers.

93

1   Q.   Can you turn to page 245 of the

2   exhibit. Under answer number 352, there are a

3   number of different, I guess, deliverables

4   described as part of an S3 implementation

5   project. The first heading refers to an As Is

6   Assessment.

7   Do you have an understanding of the

8   meaning of that term?

9   A.   Yes.

10   Q.   What are the nature of the services --

11   or what is the deliverable associated with Lawson

12   providing an as is assessment to an S3 client?

13   A.   It may vary by customer. Generally

14   speaking, this is a process whereby Lawson

15   consultants use interview tools or review

16   documentation that the customer provides to

17   familiarize themselves with the current -- the

18   customer's current operations on their legacy

19   software.

20   Q.   Once Lawson has provided this as is

21   assessment, what would be the next phase of a

22   typical S3 implementation project?

23   A.   Again, it depends on the customer, and

24   it depends on the implementation approach being

25   used. But typically the next thing that would be

95

1   Q.   It says under that heading, the last

2   sentence reads, "Our consultants will work with

3   you to design your integration points and map the

4   data fields from your existing system to your new

5   Lawson system."

6   Do you know what is meant by the term

7   "map the data fields"?

8   A.   Yes.

9   Q.   What types of services are involved

10   with that?

11   A.   Typically, that involves helping a

12   customer to understand where a -- where a

13   particular field in a legacy system, where that

14   data would go in Lawson.

15   Q.   The next heading relates to Data

16   Conversion, Migrating Your Legacy System Data.

17   It indicates, "Our consultants will share with

18   you what similar organizations have done to help

19   make this decision and help you map the data

20   fields from your legacy system to your new Lawson

21   system."

22   So Lawson actually will assist the

23   customer with doing the mapping of the data

24   fields from the legacy system to the appropriate

25   data fields in the new Lawson system; is that

94

1   done is project team training.

2   Q.   What is involved with project team

3   training?

4   A.   This is instructor led training

5   specifically geared towards educating the project

6   team, not the end users, but the people who will

7   be setting up the software on the functionality

8   of the product and the processing.

9   Q.   The next heading refers to Designing

10   Your Lawson System. Are Lawson professional

11   services personnel involved with the client in

12   connection with designing the client's Lawson

13   system to be implemented?

14   A.   Sometimes, yes.

15   Q.   And then Integration Development. Do

16   you know what is meant by that term?

17   A.   Yes.

18   Q.   What does that term mean?

19   A.   Here it is referring specifically to

20   the process of getting your data out of your old

21   system and determining how to get it into Lawson.

22   Q.   So what is Lawson's involvement with

23   that stage of the implementation project?

24   A.   It depends on the customer and the

25   contract.

96

1   correct?

2   A.   We could. I would say most often we

3   would provided advice in that regard.

4   Q.   And Lawson provides the client with the

5   correct formats that they need to use in order to

6   map the data fields from the legacy system to the

7   correct data fields in the new Lawson system,

8   correct?

9   A.   That's correct.

10   Q.   Then do most customers use the import

11   utility utilities that come native with the

12   applications as part of this data migration

13   process?

14   A.   Yes. As one tool in a part of the

15   overall migration process, I would say customers

16   do typically use the native programs.

17   Q.   On the next page 246, continuing with

18   that topic relating to data migration. The next

19   sentence reads, "Once the data is converted, it

20   must be reconciled to ensure conversion

21   accuracy."

22   Will Lawson assist the client with this

23   data reconciliation part of the process?

24   A.   Not typically.

25   Q.   Does Lawson sometimes assist the

97

1 clients with this?
2 A. Rarely.
3 Q. The next heading relates to quality
4 control, and it refers to -- first it says -- it
5 refers to the initial installation.
6 Does Lawson professional services
7 provide services to assist clients with the
8 actual installation of Lawson applications?
9 A. Yes. We do provide those services to
10 some customers.
11 Q. Then it indicates that "Once the
12 initial installation is complete, your Lawson
13 consultants will help you conduct quality
14 assurance testing."
15 What is involved with quality assurance
16 testing services provided by Lawson?
17 A. It could involve a number of different
18 types of tests. But most generally, Lawson
19 consultants might help a customer to identify the
20 critical business processes that need to be
21 tested, might help them to develop test scripts
22 appropriate to those business processes, and then
23 would facilitate the actual testing of the system
24 most commonly with the customer doing the testing
25 with Lawson there to provide assistance and

98

1 support as they encounter problems.
2 Q. Do you know for what percentage of
3 Lawson's S3 procurement system implementations it
4 has provided on-site installation services?
5 A. I don't know.
6 Q. Is there a way that you could find that
7 out?
8 A. Are we talking about a particular time
9 period, like the last 12 months or ever?
10 Q. Well, let's start with the last 12
11 months, but then I would want to find out maybe
12 for the last six years.
13 A. It may be possible to get that
14 information.
15 Q. Where would you go to find that out?
16 A. I would probably need to -- probably
17 need to coordinate data from a variety of
18 different systems.
19 Let me clarify one thing. Are you
20 asking for the customers that Lawson has been
21 involved in their implementation, or are we
22 talking all Lawson customers, whether or not
23 Lawson was involved in their implementation?
24 We may have been involved, you know,
25 with a customer but not with their supply chain

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1 implementation or -- and, again, there are other
2 customers that do not choose Lawson to provide
3 services at all.
4 Q. I'm asking for all S3 procurement
5 system implementations, the percentage of those
6 for which Lawson provided on-site installation
7 services.
8 A. Installation services?
9 Q. Right. Can you turn to page 251 of the
10 exhibit. On this page there is an answer
11 relating to the detailed implementation process
12 and the steps included in an implementation plan.
13 I want to ask for each one of these
14 steps in an implementation plan whether Lawson
15 would be involved with the client in conducting
16 that step.
17 So, for example, in implementation
18 planning, is the Lawson professional services
19 organization typically involved with that stage
20 of the implementation?
21 MR. SCHULTZ: Are you referring
22 specifically to Supply Chain Management?
23 Q. Well, okay. I can refer to -- let's go
24 specifically for Supply Chain Management
25 implementations. Is Lawson typically involved

100

1 with the implementation planning stage of that
2 project?
3 A. Sometimes. Are we referring to just
4 customers where -- who have selected Lawson to
5 provide services?
6 Q. Correct.
7 A. Yeah. I would say typically we're
8 involved with those if a customer has chosen to
9 implement their software.
10 Q. Is Lawson typically involved with the
11 installation of hardware for S3 Supply Chain
12 Management implementations?
13 A. Not typically.
14 Q. What circumstances would Lawson be
15 involved with the installation of hardware?
16 A. Certainly in an environment where we
17 are hosting the system, we would be involved in
18 the installation of hardware. It's possible that
19 we could be involved in the installation of
20 hardware for, say, a small portion of the system,
21 such as mobile supply chain handhelds.
22 Q. I think you have mentioned earlier
23 today that in almost every circumstance where
24 Lawson is involved with an implementation, you
25 provide product training of some sort to the

101

1   client; is that correct?

2   MR. SCHULTZ: Again, that's in the

3   supply chain?

4   Q.   Well, more generally, I think the

5   witness has already answered that for almost 100

6   percent of all implementations, Lawson provides

7   product training for the client. Is that

8   correct?

9   A.   Over the course of their entire

10   relationship as a Lawson customer.

11   Q.   For what percentage of implementation

12   projects specifically would Lawson be involved

13   with providing product training to the client?

14   A.   Initial implementations. So brand-new

15   customer, never used Lawson before, I would say

16   that number is between 90 and 100 percent.

17   Q.   What about for implementations that

18   relate to product upgrades, is there typically

19   product training provided by Lawson in connection

20   with product upgrade type projects?

21   A.   If the customer chooses Lawson for that

22   service, we can provide training in an upgrade,

23   yes.

24   Q.   I think you have testified that Lawson

25   does assist the client with respect to product

102

1   planning and system design in connection with

2   implementation projects; is that correct?

3   A.   Yes. That's common.

4   Q.   Then, I think, you have already

5   indicated that Lawson can provide services to

6   assist clients with existing system conversion

7   and conversion of the data from the legacy system

8   into the proper formats for the Lawson -- the new

9   Lawson system; is that correct?

10   A.   We do provide some services that

11   support that process.

12   Q.   And with respect to the step of the

13   implementation plan relating to build database,

14   what are the nature of the services that Lawson

15   would provide that fall under that category?

16   MR. SCHULTZ: We're talking S3 Supply

17   Chain Management, correct?

18   MS. ALBERT: Well, just more generally

19   first, I guess.

20   A.   I don't think it necessarily matters

21   which part of the suite -- which suite we're

22   referring to.

23   Generally speaking, our involvement in

24   building the database refers to populating the

25   specific setup criteria or helping a customer to

103

1   make decisions and populate the setup criteria.

2   Q.   What do you mean by setup criteria?

3   A.   Lawson system is configurable, so the

4   way that a customer builds the system is by

5   establishing codes, if you will, and setting

6   parameters to work together in such a way that it

7   supports their desired business processes.

8   So an example could include choosing a

9   code in a name for the company and setting that

10   code up in the system. That would be considered

11   data that is built into the system. We would

12   assist the customer with doing that.

13   Q.   What is the difference between the

14   system's test phase and the operations test

15   phase?

16   A.   There are a lot of different forms of

17   testing and different phrases or terms used to

18   describe different types of testing.

19   Commonly a systems test will refer to a

20   test that uses -- that tests not just the

21   application unto itself but also the systems to

22   which it might integrate.

23   An operations test, again, I don't know

24   what they are specifically referring to here, but

25   that sometimes is called user acceptance testing

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1   to ensure that the software, the system, the

2   processes, the configuration works as a part of

3   the overall operations of the business.

4   Q.   How, if at all, are the Lawson

5   professional services personnel involved with

6   systems testing for a client on an implementation

7   project?

8   A.   We're typically involved in a planning

9   and support capacity to help them again

10   understand what they should be testing and how to

11   organize their test and then support them as they

12   test when issues come up that need to be

13   addressed.

14   Q.   So do you also help the client actually

15   write the test protocols?

16   A.   Sometimes.

17   Q.   And then how, if at all, are Lawson

18   professional services personnel involved with

19   conducting operations tests for a client on an

20   implementation project?

21   A.   All of the same types of functions

22   would apply to the different tests types.

23   Q.   What is meant by final systems review?

24   A.   Again, this could refer to a number of

25   different things. But typically, prior to going

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1 live with the system, we help a customer to

2 assess their complete readiness, whether that be

3 the functionality of the software, the business

4 processes, or their infrastructure, you know,

5 load testing, those kinds of things to ensure

6 that the system is prepared to go live.

7   Q.   What is meant by roll out?

8   A.   Roll out would be another term for go

9 live.

10   Q.   Can you turn to page 253, please.

11 Under the heading Existing System Conversion, the

12 first sentence reads, "If you are replacing an

13 existing computer application and a conversion of

14 existing data is a possibility, then minimally a

15 comparative analysis of existing system data

16 fields to the new system should be conducted."

17   Who performs this comparative analysis

18 that is referenced in this phase of the

19 implementation project?

20   A.   Most commonly the customer will perform

21 that.

22   Q.   Down below there is a reference to a

23 conversion plan that outlines the approach,

24 timing and tasks to be completed. Do you see

25 that?

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1   A.   Yes.

2   Q.   Who is involved with generating the

3 conversion plan?

4   A.   Let's say it's a collaborate effort

5 between the customer and the Lawson project

6 manager.

7   Q.   You referred to a project team before

8 when we were talking about project team training.

9 Does the term "project team" as used by Lawson

10 refer to the client's personnel involved on an

11 implementation project versus Lawson personnel?

12   A.   Yes. There could be other people

13 involved too, but, yes, the client.

14   Q.   Can you turn to page 268 of the

15 exhibit. Under answer number 374, there are

16 provided some roles and responsibilities of the

17 Lawson personnel.

18   Can you describe at a high level what

19 the roles and responsibilities of the Lawson

20 strategic account manager on an implementation

21 project would be?

22   A.   Honestly, I'm not aware that Lawson

23 still has strategic account managers. We did at

24 one time, but I don't think they are currently a

25 job title within the organization.

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1   Q.   What would be the roles and

2 responsibilities of a Lawson project manager on

3 an implementation project?

4   A.   It depends. It varies widely from

5 customer to customer.

6   Q.   Is a project manager the same thing as

7 a project leader?

8   A.   Not necessarily.

9   Q.   What are the distinctions between

10 somebody that would be referred to as a project

11 manager versus a project leader on an

12 implementation?

13   A.   Typically project leaders are used on

14 smaller projects, and typically their involvement

15 in a project is -- well, it's less. So they

16 might be responsible for some specific

17 activities, and then only support a customer when

18 a customer comes and asks for help.

19   Whereas a project manager is more

20 likely to be working on a larger project and

21 involved in many more aspects of the entire

22 implementation.

23   Q.   The next Lawson personnel that is

24 referred to in this answer is somebody that would

25 have the title of functional application lead,

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1 and that person's responsibilities are on page

2 270.

3   It indicates here in this answer that

4 "With respect to an implementation project, a

5 Lawson functional application lead will

6 participate in design, implementation and testing

7 of the applications, assist in the design of the

8 system configuration, map data from legacy system

9 to Lawson application," among their various

10 responsibilities listed there.

11   Is that accurate?

12   A.   Yes. I would say our consultants have

13 been involved in all of those tasks to varying

14 degrees on different projects.

15   Q.   What is the distinction between a

16 Lawson functional application lead and a Lawson

17 technical lead?

18   A.   The application leads have knowledge of

19 the actual functional applications themselves,

20 the parameters, the data -- specific knowledge of

21 each particular application.

22   Whereas a technical lead would likely

23 have more of a systems or technical understanding

24 of the system. So they would maybe understand

25 the underlying architecture or the infrastructure

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1   that supports the application but not the
2   application details itself.
3   Q.   I think that's all for that exhibit.
4   I'm just trying to view some stuff and see if I
5   can cut down.
6   Let me have the reporter mark as
7   Raleigh Exhibit 8, a document entitled Lawson RFP
8   Reference Guide. It has production numbers
9   LE00320976 through 1054.
10   (Thereupon, RFP Reference Guide was
11   marked as Exhibit 8 for
12   identification.)
13   Q.   Are you familiar with the document that
14   has been marked as Raleigh Exhibit 8?
15   A.   No.
16   Q.   Does it appear to be the type of
17   document maintained by Lawson as part of its
18   ordinary course of business?
19   A.   Yes.
20   Q.   Do you know if the people with
21   responsibilities for preparing RFPs utilize an
22   RFP reference guide of this type to assist them
23   with preparing responses to RFPs?
24   A.   I don't know.
25   Q.   Can you turn to page 45 of the exhibit,

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1   change the tape.
2   THE VIDEOGRAPHER: This is the end of
3   videotape three in the deposition of Hannah
4   Raleigh. We're going off the record at
5   11:57.,
6   (Off the Record.)
7   THE VIDEOGRAPHER: This is videotape 4
8   of Hannah Raleigh. We're back on the record
9   at 12:03.,
10   Q.   Let me ask the reporter to mark as
11   Raleigh Exhibit Number 9, a document entitled
12   Lawson Learning Maps, bears production numbers
13   L011497 through 522.
14   (Thereupon, Learning Maps was marked as
15   Exhibit 9 for identification.)
16   Q.   Are you familiar with the document that
17   has been marked as Raleigh Exhibit 9?
18   A.   I don't think I have read it, but I'm
19   familiar with the content.
20   Q.   What is the purpose of the document?
21   A.   This document would help a new customer
22   understand the types of learning that they will
23   need based on their role in a Lawson
24   implementation.
25   Q.   What is meant by the term "Lawson

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1   please.
2   MR. SCHULTZ: Object to foundation.
3   Q.   Under the heading Data
4   Conversion/Interface Options, the first paragraph
5   reads, "At Lawson we recognize that some
6   organizations require minimal assistance with
7   data conversion and interface processes while
8   others prefer more.
9   "For those organizations that like to
10 perform data conversion and prepare interfaces
11 themselves, Lawson supports this. Our Lawson
12 consultants will assist with the mapping of data
13 from the legacy systems to Lawson."
14   The second paragraph reads, "Other
15 organizations need additional assistance. Lawson
16 can format the legacy data to be extracted and
17 then load it into the new Lawson system."
18   So is that accurate that Lawson will
19 offer these type of services for those clients
20 that need some additional service -- assistance
21 with data conversion?
22   A.   It is true that we will create programs
23 that will do that in some circumstances.
24   MS. ALBERT: The videographer has
25   indicated that we need to take a break to

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1   learning maps"?
2   A.   I believe the term "map" was meant to
3   refer to the -- again, mapping the types of
4   learning to the particular individual and their
5   role in implementation or in a client
6   organization and the sequence in which they would
7   take that training.
8   Q.   Can you turn to page 9 of the document.
9   A.   Yes.
10   Q.   There is a note on that page that
11 "Effective November 1, 2006, all new client
12 implementations, Lawson or partner led, all new
13 product implementations at existing clients
14 over" -- I guess that's "$100,000, "and any new
15 project at an existing client over $100,000,
16 including upgrades, reimplementations and
17 redesign work require a formal learning plan."
18   What is meant by the term "formal
19 learning plan"?
20   A.   I'm thinking back to this point in
21 time. It could refer to a document, a
22 deliverable of a project, that would formally map
23 out each individual in the project team and their
24 learning requirements and the timing -- which
25 classes they need to go to and when they are

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1   going to go to those classes.
2   It's possible that there was an online
3   tool or something that we deployed at this time
4   that maybe automated that process, but the
5   content of a learning plan is the same, whether
6   it's an online tool or a word document, for
7   instance, or an Excel spreadsheet.
8   Q.   Why did Lawson adopt this policy that
9   there was a requirement of a formal learning plan
10   for these types of implementations?
11   A.   I don't know all of the reasons behind
12   that decision at that time.
13   Q.   Do you know any of the reasons?
14   A.   I would imagine this was an attempt to
15   ensure that our customers had followed the
16   appropriate learning paths to help our support
17   organization to know that the types of support
18   they are providing is to customers who have been
19   appropriately trained.
20   Q.   Can you turn to page 10 of the exhibit.
21   The first sentence or the first paragraph reads,
22   "Project managers are expected to plan and
23   schedule the training courses outlined in the
24   learning plan. In most cases, training is the
25   first activity experienced by a new Lawson

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1   project team, so it creates a first and often
2   lasting impression of Lawson.
3   "It is also often the final activity as
4   end users are trained on their new Lawson
5   applications before going live -- before the go
6   live."
7   So am I correct that for most
8   implementation projects there is training
9   provided by Lawson at the beginning of the
10   implementation project, as well as training
11   provided by Lawson at the end or near the go live
12   part of the implementation project?
13   A.   It depends on the customer and the
14   project. I would say that most commonly Lawson
15   does not provide the end-user training. We do
16   offer that as a service, but most commonly we do
17   not provide that service to our customers.
18   Q.   Do the customers utilize Lawson
19   educational materials to provide the end-user
20   training themselves?
21   A.   Sometimes.
22   Q.   So the training that is referred to at
23   the beginning of an implementation is to the
24   members of the project team itself, correct?
25   A.   That's correct.

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1   Q.   And then the training that comes
2   towards the end of an implementation is to the
3   end-user community, correct?
4   A.   That's correct.
5   Q.   Can you turn to page 17 of the exhibit.
6   Under the heading Lawson S3 Supply Chain
7   Management, there are a number of applications
8   listed there and associated courses.
9   So, for example, with respect to Lawson
10   procurement, there are courses listed there:
11   Lawson Procurement Workshop 9.0, Requisitions
12   9.0, Purchase Order 9.0, Inventory Control 9.0,
13   and Invoice Matching 9.0.
14   Do you know whether these courses are
15   currently offered by Lawson?
16   A.   Yes. They are. Can I clarify an
17   earlier statement?
18   Q.   Sure.
19   A.   In reviewing the document, as we have
20   been to go through these questions, I'm realizing
21   this was a document that was published for
22   internal use, not for our customers.
23   I had originally thought this was --
24   something targeted towards our customers, but it
25   appears, just from reviewing it, this is

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1   actually -- this was published as an internal
2   document.
3   Q.   So what is the purpose for which this
4   will be used internally?
5   A.   It appears to be a document that was
6   meant to clarify a Lawson learning, you know,
7   policies and processes for our project managers
8   to help them be more effective in this stage or
9   this aspect of their role, their job.
10   This is information that was always
11   sort of known but not necessarily documented. It
12   appears this was maybe an attempt to document
13   what had previously not been documented for our
14   staff.
15   Q.   All right. Thank you for that
16   clarification. I'm done with that document, I
17   think.
18   Let me have the reporter mark as
19   Raleigh Exhibit 10, a document entitled Lawson
20   Implementation Approach. It bears production
21   numbers L0067967 through 978.
22   (Thereupon, Lawson Implementation
23   Approach was marked as Exhibit 10 for
24   identification.)
25   Q.   Are you familiar with the document that

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1   has been marked as Raleigh Exhibit 10?
2   A.   I'm familiar with the content, but I
3   don't think I have ever read the document.
4   Q.   Are you familiar with Lawson's
5   Implementation Approach that is referred to as
6   stepwise?
7   A.   Yes.
8   Q.   Can you describe at a high level
9   what -- the fundamentals of Lawson's stepwise
10   implementation approach?
11   A.   You know, step one is an implementation
12   methodology that Lawson uses to implement
13   products, to implement software with our
14   customers.
15   It follows the same general approach of
16   many other implementation methodologies. It
17   organizes the work into particular streams and
18   the processes and gives the project team and our
19   customer team, you know, a way of understanding
20   where they are at any time in the course of the
21   implementation.
22   Q.   So on the first page, it refers to
23   three phases in the stepwise methodology: The
24   first being the defined phase, the second being
25   the established phase and the third being the

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1   execute phase; is that correct?
2   A.   Correct.
3   Q.   Can you turn to the next page. Under
4   the defined phase, there is a sentence in the, I
5   guess, the second full paragraph reading, "Lawson
6   solution consultants establish an alpha
7   prototype." Do you see that?
8   A.   Yes.
9   Q.   What is meant by the term "alpha
10   prototype"?
11   A.   The idea behind this is that the
12   solution consultants who are a part of the sales
13   team and are, therefore, involved in
14   demonstrating to our prospects that they would
15   establish the initial "prototype" of the, you
16   know, of the system as it pertains to this
17   particular prospect's particular business
18   processes and requirements.
19   Q.   So for a client for which Lawson was
20   providing implementation services in the nature
21   of an implementation of an S3 procurement system,
22   what would be the components of the alpha
23   prototype?
24   A.   I have to be honest, this is a step of
25   our methodology that really doesn't happen. This

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1   does not get pursued. It's something that Lawson
2   has been attempting to implement internally and
3   get to a point where we actually do this, but
4   this is really not something that Lawson does at
5   this time.
6   Q.   So with respect to the define phase,
7   what would you say is the first activities that
8   Lawson engages in in that phase?
9   A.   Again, all of the aspects of the define
10   phase happen during the sales cycle. We do do a
11   statement of work that is performed. The project
12   plan is not always performed, but the project
13   budget is typically established as a part of the
14   sales process.
15   A learning strategy and plan would be
16   devised and documented in the statement of work.
17   And some version of an IT solution description
18   would be defined as a way of helping the customer
19   to understand what the architecture of the system
20   is and what hardware and software components
21   would be required to run Lawson.
22   Q.   Referring to page 3 of the exhibit, you
23   referenced a statement of work in -- I guess it's
24   the fourth paragraph on page 3, refers to the
25   statement of work.

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1   It indicates that "The statement of
2   work is a key legal document linked to the master
3   agreement. Lawson ensures that there are strict
4   change control processes in place so that your
5   project steering committee is aware of any
6   variations to the initial scope and approve the
7   variations prior to any work being done, thus
8   improving project governance and budget
9   visibility."
10   So in the circumstance where there is a
11   change in scope in a project, must Lawson approve
12   that change in scope?
13   A.   Yes.
14   Q.   Can you turn to page 4 of the exhibit.
15   Under the established phase of the implementation
16   project, it indicates that "One aspect of the
17   established phase is that the customer IT staff
18   attends a system foundation learning camp prior
19   to attending specific technical training in
20   managing the environment security and operational
21   routines."
22   Does Lawson professional services
23   provide this learning camp for the customer's IT
24   staff?
25   A.   Yes. That would be one of the

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1 offerings in the Lawson learning part offerings.
2   Q.   And the next paragraph indicates that
3 "Lawson creates an IT operations handbook
4 defining how the IT environment should be
5 operated." Correct?
6   A.   It depends, but, yes, that's one of the
7 services we can provide.
8   Q.   And further down in that paragraph, it
9 indicates that "Training and data migration tools
10 will also occur during this phase."
11   So Lawson provides training to the
12 customer's IT staff in the Lawson data migration
13 tools during the established phase of the
14 project; is that correct?
15   A.   Sometimes. Yes.
16   Q.   Can you turn to page 5 of the exhibit.
17 Under the heading Training for Project Members,
18 one of the items is listed as prototype
19 validation.
20   And the next describes there that "As
21 the process enters and consultants work together
22 to validate each version of the prototype,
23 knowledge is further consolidated."
24   So is Lawson involved with validating
25 the customer's prototype system during this

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1 phase?
2   A.   Yes. Sometimes. This would probably
3 map back to the ideas of testing. So prototype
4 validation would be accomplished through testing,
5 and so the consultants participate in some
6 varying ways in the testing process or the
7 validation process.
8   Q.   The second paragraph from the bottom of
9 the page reads that "Some data may have been
10 migrated and tested at this stage, however, the
11 acceptance test seems only sample data is being
12 used for the test."
13   Where does the sample data come from
14 that is used for acceptance testing?
15   A.   It depends. It could be a subset of
16 the customer's intended data, or it could be
17 completely made-up data.
18   Q.   Can you turn to page 7 of the exhibit.
19 At the bottom of the page there is a heading
20 relating to Project Change Control.
21   The first sentence under that heading
22 reads, "Strict project change control procedures
23 are built into stepwise to ensure that each
24 change request is approved by appropriate
25 authority levels and that the change order is

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1 directly linked to the original statement of
2 work."
3   Does each change request for an
4 implementation project need to be approved by
5 Lawson?
6   A.   Yes.
7   Q.   Can you turn to page 9 of the document.
8 There is a heading on that page that relates to
9 Data Migration. It indicates that "Stepwise data
10 migration starts with the data review in the
11 define phase." Do you see that?
12   A.   Uh-huh.
13   Q.   It indicates that "Our standard
14 approach is that the extraction and cleansing of
15 data is the customer's responsibility."
16   Towards the bottom of that paragraph,
17 it states, "However, Lawson will assist with
18 extraction and mapping. Lawson will assist with
19 the cleansing for the vendor master and item
20 master." Is that correct?
21   A.   I'm sorry. This document seems to have
22 some idiosyncrasies here. It refers to a
23 specific customer, which I don't know why that
24 is. I don't know where this came from. This
25 caught me off guard here for a second.

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1   Again, I'm not sure where this document
2 came from or why it would suddenly start to refer
3 to a specific customer or their specific
4 agreement with Lawson.
5   Up until this point this document
6 appeared to be an internal document documenting
7 our methodology. But suddenly here in this
8 paragraph, it refers to the University of
9 Maryland Medical Center. I think that's the one
10 that it is. And it gets specifics about the fact
11 that they are using home grown legacy systems.
12   I don't know that I can assume that the
13 rest of that paragraph is a generic statement
14 versus something specifically stated to this
15 specific customer. I'm not sure what that means.
16   Q.   Do you know with respect to University
17 of Maryland Medical Center whether Lawson
18 assisted that particular client with the data
19 cleansing effort for the vendor master and item
20 master?
21   A.   I don't know. I'm not even sure that
22 Lawson was involved in their implementation. I'm
23 not even sure this is Maryland. It could be
24 Mississippi. I just don't know whether UM -- I'm
25 not sure what UMMC specifically refers to or why

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 1      it's in this document at all.
 2          Q.   Are there some Lawson clients that
 3      Lawson assists the clients with the data
 4      cleansing effort for the vendor master and the
 5      item master?
 6          A.   It's extremely rare.  I'm aware of two
 7      examples where, although it was not originally
 8      contracted for Lawson to provide that form of
 9      assistance, the customer had actually outsourced
10      that assistance or had planned for their own
11      staff to do it, but ran into problems with that
12      and falling behind on their timeline, and Lawson
13      agreed to help them with that type of work.
14              This is really not data cleansing,
15      especially is not a type of work that Lawson
16      does.
17          Q.   What were the two clients that you're
18      aware of that Lawson assisted in connection with
19      the data cleansing effort for the vendor master
20      and item master?
21          A.   One was Shriners Hospital for children.
22          Q.   What was the other client?
23          A.   The other is Nebraska Methodist
24      something or other, Methodist Hospital or
25      Methodist health system.
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 1          Q.   Continuing below that paragraph, it
 2      provides some bullet points relating to Lawson
 3      responsibilities, one being collect sample data
 4      for prototyping entered manually into the initial
 5      data.
 6              Does Lawson assist clients with those
 7      types of activities in connection with
 8      implementations of S3 Supply Chain Management
 9      type systems?
10          A.   Again, I'm thrown by the fact there is
11      a specific customer reference in here, so I'm not
12      sure what this document is -- really is.
13              "Collect sample data for protyping,
14      enter manually."  We could.  That is not
15      something commonly that we tell our customers
16      that we will do.
17          Q.   At least perhaps on this occasion it
18      was communicated to UMMC that Lawson would
19      provide such services?
20          A.   I don't know.
21          Q.   We have referred today that Lawson will
22      collaborate with the client's IT team to assist
23      with data mapping in connection with data
24      conversion type services, correct?
25          A.   That's correct.
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 1          Q.   And Lawson does provide data mapping
 2      tools to its clients to assist in connection with
 3      data migration efforts on implementation
 4      projects, correct?
 5          A.   Data mapping tools?  I'm not sure
 6      exactly what that would refer to.  Certainly
 7      documentation, file formats, that sort of thing,
 8      if that's considered a tool, then, yes, that's
 9      something we would provide.
10          Q.   Then there are those import utilities
11      that are native to some of the applications,
12      correct?
13          A.   Right.  Those wouldn't necessarily be
14      data mapping tools.  But those would be data
15      loading tools.
16          Q.   And we have talked about the fact that
17      Lawson will provide workshops to educate its
18      clients on data migration requirements and
19      mapping, correct?
20          A.   Yes.
21          Q.   Lawson will also carry out training in
22      the data migration environment management
23      processes and tools for clients in connection
24      with implementation projects?
25          A.   I'm not sure exactly what that refers
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 1      to.  It's different from the previous bullet
 2      point.
 3          Q.   We have talked about today that -- I
 4      think you mentioned already that Lawson will
 5      support its customer's IT personnel in executing
 6      initial tests on samples of extracted and
 7      cleansed data in connection with data conversion
 8      efforts?
 9          A.   Yes, that's correct.
10          Q.   Then typically is it the client's
11      responsibility for confirming and validating
12      converted data?
13          A.   Yes.
14          Q.   Does Lawson ever assist in the process
15      of validating converted data?
16          A.   I would like to say never.  There may
17      be a case somewhere that I'm not aware of but
18      almost never.
19          Q.   Let's try to go quick on this one.  Let
20      me have the reporter mark as Raleigh Exhibit 11,
21      a document entitled S3 Online Learning Library,
22      Catalog of Web Based Training, bears production
23      numbers L0099017 through 1344.
24              (Thereupon, S3 Online Learning Library
25      was marked as Exhibit 11 for
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 1           identification.)
 2      Q.   Can you identify the document that has
 3    been marked as Raleigh Exhibit 11?
 4      A.   It appears to be our online learning
 5    library catalog of courses.
 6      Q.   Do you know whether this is the most
 7    recent version of the catalog?
 8      A.   I don't know.
 9      Q.   If you turn to the second page of the
10    exhibit, do you see there is a copyright notice,
11    indicating copyright 2007?
12      A.   Yes.
13      Q.   So does that assist you in determining
14    whether this is the most recent version of the
15    catalog?
16      A.   Not really.  It may be the most recent
17    version of the published catalog, but there may
18    have been additions to the library.  I don't know
19    if we have published a more recent version.
20      Q.   Who has responsibilities for
21    maintaining the content in the online learning
22    library?
23      A.   The learning organization.
24      Q.   Is the learning organization part of
25    Lawson professional services?
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 1      A.   Yes.
 2      Q.   Who is the head of the learning
 3    organization?
 4      A.   If you didn't ask me, I could have told
 5    you.  His name escapes me at the moment.  I can
 6    get that information for you.  Allan Hupp, Allan
 7    Hupp.
 8      Q.   If you turn -- can you turn to page 1
 9    of the exhibit, and the Bates number on that page
10    ends with 020.
11      A.   Yes.
12      Q.   Actually, on pages 1 and 2 there are
13    some headings, Interactive Webcast, Customer
14    Discussion Forums.  And then if you flip to page
15    2, the first heading on that page is On Demand
16    Courses.
17           Are those the three types of offerings
18    available under the category of Lawson's online
19    learning library?
20      A.   At that time they may have been.
21      Q.   What are the current offerings
22    available under the Lawson online learning
23    library?
24      A.   I don't know, but I would refer back to
25    one of the previous documents, exhibits, that
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 1    seem to have newer information.
 2      Q.   You said that -- I think you said
 3    earlier today that courses can be -- the fees
 4    associated with courses can be assessed either on
 5    a per course basis or a client can obtain an
 6    annual subscription; is that correct?
 7      A.   That's correct.
 8      Q.   Do you know what the cost for the
 9    annual subscription is?
10      A.   I don't know what the current cost is.
11      Q.   Do you know what the per course fees
12    are?
13      A.   I don't know what it is right now.  I
14    don't want to give you an incorrect number.
15      Q.   Can you turn to page 24 of the exhibit.
16    The second course on that page is entitled Vendor
17    Agreement, Import Version 8.03.  And it indicates
18    that "The course explains the process of
19    importing vendor agreements."  Do you know if
20    this course is currently offered by Lawson?
21      A.   I don't know.
22      Q.   Who would know the answer to that?
23      A.   Somebody in the learning organization
24    would be able to find out.
25      Q.   This is under the heading Procurement
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 1    Webcast.  Do you know if these webcasts for the
 2    online learning library courses are recorded
 3    somewhere?
 4      A.   Yes.  I believe so.
 5           MS. ALBERT:  Counsel, I would ask for
 6    production of a copy of the course related to
 7    vendor agreement import.
 8           MR. SCHULTZ:  My understanding is not
 9    all of the -- you have been provided the
10    recordings that we have.  That was in this
11    last production.
12           MS. ALBERT:  The last production?  How
13    many days ago?
14           MR. SCHULTZ:  Michael Strapp.  Can we
15    go off the record?
16           MS. ALBERT:  Sure.
17           THE VIDEOGRAPHER:  Off the video
18    record.
19           (Off the Record.)
20           THE VIDEOGRAPHER:  Back on the video
21    record.  12:37.,
22      Q.   Right below the course offering
23    relating to Vendor Agreement Import, there is one
24    entitled eProcurement Overview that provides --
25    introduces the major eProcurement features to
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1   include requisition self-service with punchout

2   procurement tracking.

3   Do you know if Lawson currently offers

4   a course that would provide instruction relating

5   to those topics?

6   A.   It's likely that we do.

7   Q.   Can you turn to the next page, page 25.

8   The first course offering on that page is

9   entitled Web Methods and eProcurement

10   Configuration for Punchout.

11   Do you know if Lawson currently offers

12   an online course relating to configuration for

13   punchout?

14   A.   It's likely that we do. I don't know

15   if it's this specific course or a different

16   course. It's likely that we would.

17   Q.   Can you turn to page 27 of the exhibit.

18   And the title of the course at the bottom of that

19   page is Requisition Self Service, Version 8.0.3.

20   It indicates that "This course would

21   introduce you to the major requisitions self

22   service features, the basic shopping service

23   navigation and the setup processes needed to have

24   a successful shopping experience."

25   Do you know whether Lawson currently

134

1   offers an online course relating to the current

2   version of requisition self service that would

3   include these features?

4   A.   I don't know. But it's likely.

5   Q.   Can you turn to page 64 of the exhibit.

6   The bottom course on that page refers to

7   Conversion Process Basics. It indicates that

8   "This training course is designed for members of

9   a conversion team as the first step in learning

10   how to process conversions."

11   Do you know if Lawson currently offers

12   a course that would cover these types of

13   activities?

14   A.   I don't know, but it's likely.

15   Q.   That's all for that exhibit.

16   MS. ALBERT: When do you want to take a

17   break?

18   MR. SCHULTZ: Why don't we go off the

19   record.

20   THE VIDEOGRAPHER: Off the video

21   record. 12:40.,

22   (Off the Record.)

23   THE VIDEOGRAPHER: We're back on the

24   video record at 1:27.,

25   MS. ALBERT: Let me have the reporter

135

1   mark as Raleigh Exhibit 12 a copy of a

2   document entitled Instructor-Led Training

3   Course Catalog, bears production numbers

4   L0073028 through 3134.

5   (Thereupon, Instructor-Led Training

6   Course Catalog was marked as Exhibit 12

7   for identification.)

8   Q.   Ms. Raleigh, can you identify the

9   document that has been marked as Exhibit 12?

10   A.   Yes. It looks like our course catalog

11   for the courses that we teach in our public

12   offices or potentially at on-site customers.

13   Q.   As compared to the online courses,

14   would the instructor-led training courses be

15   where the instructor and the students were

16   present in the same location?

17   A.   Yes. Most often that would be true.

18   Q.   And these are courses that would be

19   interactive between the participants and the

20   instructor?

21   A.   Yes.

22   Q.   Do you know if this is the most recent

23   version of the Instructor-Led Training Course

24   Catalog?

25   A.   I don't know.

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1   Q.   Who is responsible for providing

2   instructor-led training?

3   A.   For providing the actual training?

4   Q.   Uh-huh.

5   A.   It can either be provided by our loss

6   and learning organization or by our business

7   consultants.

8   Q.   All of those groups of people, are they

9   all part of the loss and professional services

10   organization?

11   A.   Yes.

12   Q.   Can you turn to page 68 of the catalog

13   that is on the page with the Bates number ending

14   3096.

15   A.   Yes.

16   Q.   And the course described on this page

17   is entitled Inventory Control 8.0, and the course

18   description indicates that "Inventory Control 8.0

19   provides instruction on the key setup components

20   and processing functionality of the 8.0 loss in

21   inventory control application. The key setup

22   components deal with both company structural

23   elements and item-related setup.

24   "The key areas of processing include

25   entering inventory control transactions

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1 (receipts, transfers, issues, et cetera)

2 replenishing inventory and performing a physical

3 inventory. This course provides hands-on

4 opportunities for learners to practice the

5 concepts and procedures as they are taught."

6   Does that last sentence indicate that

7 the course attendees can actually practice what

8 they learn on a loss and educational system or

9 training system?

10   A.   Yes. On a loss and training database.

11   Q.   Underneath that text there is some

12 topics that are listed as being included in the

13 program -- or in the course, one being item

14 master setup. Do you see that?

15   A.   Yes.

16   Q.   Do you know if Lawson still offers an

17 inventory control course that would include

18 instruction on item master setup?

19   A.   Yes, I believe so.

20   Q.   Who is the target audience for this

21 course?

22   A.   Well, the list of roles or customer

23 personnel that is listed here would all be

24 appropriate.

25   Q.   So some persons that are targeted for

138

1 the course would include implementation team

2 members, inventory control team members,

3 materials managers, inventory managers, and

4 warehouse managers?

5   A.   Yes, that's correct.

6   Q.   And it says at the top of the page that

7 the price for this course was $1650. Do you have

8 any idea what the current price for a course of

9 this type would be?

10   A.   I don't know, but it would be on the

11 rate card that we discussed previously.

12   Q.   Can you turn to the next page of the

13 exhibit. And this course is entitled Inventory

14 Control 8.1. And the course description also

15 indicates that this course provides instruction

16 on the key setup components that deal with both

17 company structural elements and item-related

18 setup.

19   Do you see that?

20   A.   Yes.

21   Q.   Underneath the topics that are listed

22 as included in the course, one topic is item

23 master setup. Do you see that?

24   A.   Yes.

25   Q.   Do you know how this course differs

139

1 from the one that is described on the prior page

2 of the exhibit?

3   A.   The only difference between these two

4 courses and the one on the following page is the

5 version of the software.

6   Q.   So the course on page 68 is for the

7 Inventory Control Version 8.0?

8   A.   Correct.

9   Q.   And the course on page 69 is for

10 Inventory Control Version 8.1. And then there is

11 also a course described on page 70 that relates

12 to Inventory Control Version 9.0?

13   A.   That's right.

14   Q.   Can you turn to page 73 of the exhibit.

15   A.   Okay.

16   Q.   Do you see on that page there is a

17 course entitled Procurement Workshop 8.1?

18   A.   Yes.

19   Q.   This is an eight-day course that was

20 priced at $4400 per attendee, I guess that would

21 be; is that correct?

22   A.   At that time, yes. That would be

23 correct.

24   Q.   The description of this course

25 indicates that it presents key concepts for

140

1 setting up and processing procurement

2 applications, which include inventory control,

3 requisitions, purchase order, and invoice

4 matching.

5   Do you know if Lawson continues to

6 offer an instructor-led training course with

7 subject matter such as indicated for the course

8 on this page?

9   A.   I believe so.

10   Q.   And the target audience for this type

11 of course would include project leaders,

12 purchasing managers, inventory managers, advanced

13 end users, MIS, and accounts payable managers; is

14 that correct?

15   A.   Yeah, that's correct.

16   Q.   Can you turn to page 75 of the exhibit.

17 Do you see at the top of that page there is a

18 course entitled Purchase Order 9.0? Do you see

19 that course?

20   A.   Yes.

21   Q.   And the course description indicates

22 that Purchase Order 9.0 focuses on processes

23 performed in the 9 series purchase order

24 application. And below that it indicates that

25 the topics included in the course are defining

141

1   price agreements with vendors.
2   Do you know what is meant by the term
3   "price agreement"?
4   A.   There is a screen in Lawson that allows
5   a customer to define the items and the pricing
6   associated with those items that they have on an
7   agreement with the customer, so ...
8   Q.   Is there a utility included with Lawson
9   that enables the import of that item data and the
10   associated prices?
11   A.   I believe that we saw that in a
12   previous document. I don't remember what the
13   number was. But it was like PO836 or 8 something
14   or other, 865.
15   Q.   PO536?
16   A.   536, that's probably what it is, yeah.
17   Q.   And this course also includes
18   instruction on creating purchase orders. Do you
19   see that?
20   A.   Yes.
21   Q.   Do you know whether Lawson continues to
22   offer a purchase order instructor-led training
23   course with topics similar to those included on
24   page 75 of the exhibit?
25   A.   Yes, we do.

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1   Q.   Can you turn to the next page, page 76.
2   On this page is a course entitled Requisitions
3   9.0. It indicates under the course description
4   that this course presents all phases of the
5   requisition system, including requisition
6   creation, approval, processing and management.
7   Do you know whether Lawson still offers
8   a course with subject matter such as referred to
9   on page 76?
10   A.   Yes, we do.
11   Q.   That's it for that exhibit.
12   What organization within Lawson
13   provides -- is responsible for providing
14   maintenance and support services?
15   A.   I'm not sure exactly what you're
16   referring to.
17   Q.   I know earlier in the day we referred
18   to the different levels of maintenance services,
19   bronze, silver, gold, and platinum. Do you
20   recall that?
21   A.   Uh-huh, yes.
22   Q.   What organization is responsible for
23   providing those services?
24   A.   It depends on the level that is
25   purchased. So the platinum and gold is provided

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1   by Lawson professionals or a component of it is
2   provided by LPS.
3   The basic maintenance and support is
4   provided by our support and delivery organization
5   for customers who are not hosted or don't have
6   application management services.
7   Q.   Can you describe the different types of
8   services that Lawson provides under the label of
9   maintenance and support services?
10   A.   I may not be able to fully explain all
11   of them. But certainly in the realm of
12   maintenance, it would include upgrades to
13   licensed products, delivery of, obviously, of the
14   products that were purchased and associated third
15   party products that are required to run our
16   products. I don't know what else is included in
17   maintenance.
18   The support services would include the
19   loss and interactive support that we referred to
20   earlier, the telephone, the 24 by 7 telephone
21   support. There may be some other categories of
22   services that they provide that aren't.
23   Q.   You referred to product upgrades.
24   Would bug fixes and patches be product upgrades?
25   A.   Probably a separate category, but, yes,

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1   they would be included in maintenance.
2   Q.   And then the -- we saw earlier today,
3   we discussed the various different types of
4   documentation that was made available at
5   support.Lawson.com. Is that included within
6   maintenance and support services?
7   A.   Yes.
8   MS. ALBERT: Let me ask the reporter to
9   mark as Raleigh Exhibit 13 a document
10   entitled Lawson Support Operations Handbook,
11   bears production numbers LE00638034 through
12   8145.
13   (Thereupon, Lawson Support Operations
14   Handbook was marked as Exhibit 13 for
15   identification.)
16   Q.   Are you familiar with the document that
17   has been marked as Raleigh Exhibit 13?
18   A.   I haven't read the document, but I'm
19   familiar with the contents.
20   Q.   What is the purpose of the document?
21   A.   It appears to be the document that we
22   publish to our customers to help them understand
23   our support protocols.
24   Q.   What do you mean by support protocols?
25   A.   The types of support we offer, the

145

1   limitations of our support, the ways of getting

2   support.

3   Q.   Can you turn to page 17 of the

4   document, and that has the Bates number ending

5   050.

6   A.   Yes.

7   Q.   Does this page illustrate the four

8   different levels of support that we have been

9   discussing, bronze, silver, gold, and platinum,

10   and the service offerings under each level?

11   A.   Yes, it does. I'm not sure why it says

12   M3 in the upper right-hand corner. I'm not sure

13   if this was specific to M3. But it does seem to

14   illustrate those different levels that should be

15   the same for S3.

16   Q.   So the basic maintenance package at the

17   bronze level would include product upgrades,

18   updates, corrections, or corrections self-service

19   tools. What is meant by corrections self-service

20   tools, do you know?

21   A.   What they are probably referring to

22   there is the fact that a customer can go online

23   to mylawson.com and search for a particular issue

24   or error message and discover whether or not

25   there has already been a patch created for that

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1   particular issue.

2   So it's a way of identifying, you know,

3   solutions to problems that you found without

4   necessarily having to log a case and work with a

5   human being.

6   Q.   And does the way that the illustration

7   on this page work is that once you move up in the

8   level of support, you're entitled to the services

9   below your level plus additional services

10   available at that higher level? Is that

11   accurate?

12   So for instance, if I move up from the

13   bronze level to the silver level, do I have

14   access to all of the services at the bronze

15   level?

16   A.   Yes.

17   Q.   And then I have access to the

18   additional services at the silver level, such as

19   the nonwarranty support, the 24 by 7 emergency

20   support, the priority queuing online usage

21   reports and statistics?

22   A.   That's correct. I don't know whether

23   the gold and platinum includes silver. So gold

24   and platinum would certainly include bronze.

25   Silver includes bronze. I just don't know if

147

1   gold and platinum include silver. It may. I

2   don't know.

3   Q.   Can you describe the nature of the

4   services that are referred to as priority queuing

5   online usage reports and statistics?

6   A.   I believe they is supposed to be a

7   comma between "priority queuing" and "online

8   usage reports and statistics."

9   Q.   So what is meant by the term "priority

10   queuing" or what type of services are those?

11   A.   This would be a way for Lawson

12   customers to get their cases, their problems

13   prioritized higher than those of other customers.

14   They are paying an additional fee to be treated

15   like a special customer, essentially, and get

16   faster service.

17   Q.   What are the nature of the services

18   provided by Lawson that are referred to as online

19   usage reports and statistics?

20   A.   I believe this refers to reports of the

21   customer's usage of the support center, so how

22   many problem tickets did you log, how many of

23   them were, you know, training issues versus

24   procedural issues versus bug fix issues, maybe

25   how long those cases were open, how quickly they

148

1   were resolved, that sort of reporting.

2   Q.   We referred to the application

3   outsourcing services and the application

4   management services earlier. But with respect to

5   the application management services where the

6   application still resides at the customer's

7   facility, can you describe a little bit how

8   Lawson goes about managing and administering the

9   client's systems, where those systems are still

10   maintained at the client's facility?

11   A.   So technically speaking, it would be

12   through some sort of Internet protocol, so

13   usually like a VPN, a virtual private network,

14   VPN, or some other, you know, networked way of

15   our personnel being able to access their system

16   remotely.

17   Q.   So if a customer has a problem and

18   Lawson is the manager, administrator of their

19   system, when they call the help desk, they will

20   be calling directly to a Lawson personnel versus

21   an internal IT person?

22   A.   Not necessarily.

23   Q.   But the Lawson personnel can remotely

24   access that client system and assist them with

25   problems as they arise?

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1   A.   They can. But the nature of the
2   problems will dictate where the -- who they call
3   for support in what situation.
4   Q.   So in what situations would the calls
5   go directly to Lawson versus an in-house IT
6   person?
7   A.   Customers typically have their own
8   support structures established inside their
9   organization. It's somewhat of a customer's
10   decision as to how they triage calls.
11   For instance, an end user might be
12   trained to call a functional super user, right,
13   and that person triages the call and determines
14   whether it's a training issue or something like
15   that or if it requires the next step of
16   escalation to an IT person, who then can
17   determine if this is, you know, maybe the need
18   for a patch or it's a systems down or whatever.
19   Then that person might be then responsible for
20   calling Lawson.
21   If the system is down, just
22   inaccessible, that would probably be a situation
23   in which the call would be initiated from an IT
24   person at the customer directly to a Lawson
25   managed services representative to help them

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1   actually get the system back online.
2   MS. ALBERT: Let's take a brief break
3   to allow the videotape to be changed.
4   THE VIDEOGRAPHER: This is the end of
5   videotape 4 of Hannah Raleigh. We're going
6   off the record at 1:51.,
7   (Off the record.)
8   THE VIDEOGRAPHER: This is videotape
9   number 5 of Hannah Raleigh. We're back on
10   the record at 1:52.,
11   Q.   Ms. Raleigh, at the bottom of the page
12   that we were referring to, there is a reference
13   to additional options that are available from
14   Lawson such as health check. Do you understand
15   what is meant by the term "health check"?
16   A.   I'm not familiar with that specific
17   offering.
18   Q.   Pager support, do you know the nature
19   of the services that would be provided by Lawson
20   that would be referred to as pager support?
21   A.   Yes. Typically, when a customer has a
22   critical event happening during potentially
23   nonbusiness hours, they will prearrange for a
24   support person to wear a pager and be on call for
25   them if they should have a problem.

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1   Q.   So a client can obtain those services
2   from Lawson for an additional fee?
3   A.   That's correct.
4   Q.   And then also for an additional fee, a
5   client could obtain services from Lawson whereby
6   Lawson would provide staffing for the customer's
7   internal support center; is that correct?
8   A.   Presumably. I'm not aware of any
9   instances in which we have done that.
10   Q.   If a customer doesn't purchase at least
11   the basic level of maintenance and support, then
12   will the customer not be entitled to obtain
13   upgrades and updates and corrections to the
14   licensed software?
15   A.   That's correct.
16   Q.   Can you turn to page 20 of the exhibit.
17   Do you see the reference on that page to a
18   dedicated customer care manager?
19   A.   Yes.
20   Q.   In what circumstances will Lawson
21   provide a customer with a dedicated customer care
22   manager?
23   A.   I don't know how we decide where to
24   apply this customer care manager. I do know that
25   in some cases it's Lawson's decision that in

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1   order to best support a specific customer based
2   on their complexity or importance to our
3   business, we will assign that person to be
4   responsible for that customer.
5   What I don't know is whether or not the
6   customer has the ability to influence that
7   decision.
8   Q.   Can you turn to page 21 of the exhibit.
9   Under the Lawson total care gold level of
10   maintenance and support services, it indicates
11   that the customer can receive custom-tailored --
12   custom-tailored package of application management
13   services, and one such service could be Lawson
14   product database and security administration.
15   Do you see that?
16   A.   Yes.
17   Q.   What types of services does Lawson
18   provide that fall within the scope of database
19   administration?
20   A.   That could involve -- you know,
21   essentially it doesn't involve the data itself;
22   it involves the database. So things such as
23   ensuring there is enough disk space or enough
24   database space for the data, dealing with bugs or
25   issues with the database itself, potentially, you

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1 know, working with a third party to address
2 issues like that.
3   If it's an Oracle database, for
4 instance, maybe, you know, serving as a
5 go-between to work with Oracle on bug fixes,
6 issues of that nature, and certainly, you know,
7 understanding, being aware of, and being prepared
8 for or assisting with database version upgrades
9 if we need to move to the next level of the
10 database.
11   Q.   Can you turn to page 37 of the exhibit.
12 That's -- Bates number on that page ends with
13 070.
14   A.   Yes.
15   Q.   On that page there is a description of
16 services that are provided via remote access. It
17 indicates that there is something called a WebEx
18 online support center, which is used as real-time
19 remote access and collaboration tools for
20 application sharing and problem diagnosis.
21   Is this the online chat that you --
22 type service that you referred to earlier, or is
23 this some other type of -- type of service that
24 is provided by Lawson?
25   A.   I don't believe that this is referring

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1 to the online chat. I believe this is referring
2 more to the ability of a support member --
3 support staff member to actually -- to WebEx in
4 but access over the Internet the customer system,
5 maybe take control of it to diagnose a problem or
6 to just watch what the customer is doing.
7   It's the ability for me to see what
8 your screen looks like, essentially, using the
9 Internet.
10   MS. ALBERT: Let me ask the reporter to
11 mark as Raleigh Exhibit 14 a document
12 entitled Lawson Global Support, Support
13 Operations Handbook. It bears production
14 numbers L0074483 through 513.
15   (Thereupon, Lawson Global Support,
16 Support Operations Handbook was marked
17 as Exhibit 14 for identification.)
18   Q.   Can you identify the document that has
19 been marked as Raleigh Exhibit 14?
20   A.   Again, this looks -- I'm not sure what
21 the -- I guess this was a newer version. This
22 appears to be the document that we publish to our
23 customers to help them understand our support
24 protocols, again, what kind of support we
25 provide, what the limitations of our support are,

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1 how to get support.
2   Q.   This document has a 2009 date versus
3 the one that was marked as Exhibit 13 has a 2008
4 date?
5   A.   Right.
6   Q.   Can you turn to page 25 of the exhibit.
7   A.   Yes.
8   Q.   There is a bullet point entitled
9 Technical Requirements, and that bullet reads,
10 "For each Lawson product there are technical
11 requirements that are necessary for Lawson to
12 support you."
13   Do you see that?
14   A.   Yes.
15   Q.   What are the technical requirements
16 that are necessary for Lawson to provide support
17 to its clients?
18   A.   I don't know specifically what this is
19 referring to. Obviously, it's referring to
20 another document that would list those. I would
21 guess that, you know, we're indicating that
22 obviously if you don't have the ability to use
23 the Internet, right, then we can't necessarily
24 help you via an LIS session.
25   Or if you don't have a computer, we're

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1 not going to be able to help you that way.
2 Things of that nature.
3   Q.   Can you turn to page 27 of the
4 document.
5   A.   Yes.
6   Q.   There is a heading on that page
7 entitled Services Outside the Scope of Standard
8 Lawson Maintenance and Support. And it provides
9 a listing of services that are considered to be
10 outside the scope of Lawson maintenance support
11 services.
12   One -- the first bullet reads, "Service
13 considered by Lawson as in-depth training on
14 software use and functionality." That is
15 considered to be outside the scope of Lawson
16 maintenance support services, but will Lawson
17 provide this service for an additional fee?
18   A.   Generally, yes, but not through our
19 support organization. Customers would be
20 referred to LPS.
21   Q.   Then the second bullet refers to
22 "Service for licensed products and data
23 structures that have been modified by the
24 customer."
25   So will Lawson not provide maintenance

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1 services for a customer's application if the
2 customer has made modifications to the
3 application?
4   A.   If they have made modifications to the
5 specific item that the customer is asking to be
6 supported on, then no. If they have modification
7 in some other area, that doesn't invalidate their
8 support on everything.
9   Q.   But they could invalidate their support
10 for a specific problem if they had made a
11 modification to the software that related to that
12 issue?
13   A.   That's correct.
14   Q.   The third bullet indicates that
15 "Service for licensed products and data
16 structures where all required maintenance
17 releases have not been implemented by the
18 customer would be outside the scope of Lawson
19 maintenance and support services."
20   So if a customer is not current with
21 respect to the current versions of the
22 applications, Lawson will not provide support for
23 that customer?
24   A.   That's true. Lawson has a
25 particular -- it's not just the current level,

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1 but a particular set of levels that Lawson will
2 support.
3   Q.   So there are some backwards --
4 backwards releases that Lawson will continue to
5 support?
6   A.   That's correct.
7   Q.   But after a certain period of time,
8 Lawson shuts down support for prior releases?
9   A.   That's correct.
10   Q.   That's all for that document.
11   MS. ALBERT: Let me have the reporter
12 mark as Raleigh Exhibit 15 a document
13 entitled 7.2.2.4 to 8.0.3 Application and
14 Environment Upgrade iSeries Information
15 Document and Budgetary Estimate, bears
16 production numbers LE02782644 through 669.
17   (Thereupon, 7.2.2.4 to 8.0.3
18   Application and Environment Upgrade
19   iSeries Information Document and
20   Budgetary Estimate was marked as
21   Exhibit 15 for identification.)
22   Q.   Are you familiar with the document that
23 has been marked as Raleigh Exhibit 15?
24   A.   Not this specific document, no.
25   Q.   Do you know what this type of document

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1 is for, used for?
2   A.   Yes.
3   Q.   What is it used for?
4   A.   It appears to be an estimate or a
5 proposal to a specific customer for an upgrade
6 project.
7   Q.   One of the suites that was included
8 within this upgrade project was the procurement
9 suite; is that correct? If you look at the cover
10 page.
11   A.   Yes, that's correct.
12   Q.   For what percentage of Lawson clients
13 does the Lawson Professional Services
14 organization provide services relating to
15 upgrades of the systems from one version to
16 another?
17   A.   It's a difficult question to answer
18 because a customer may choose us to help them
19 with one upgrade and then not choose us to help
20 them with another in the next one or choose
21 somebody else to help them with the next one.
22   So I'm not sure that that's a number
23 that I could produce for you.
24   Q.   Do you happen -- would you happen to be
25 able to tell me how many clients utilize Lawson

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1 Professional Services to upgrade their
2 procurement suite from version 7 to version 8?
3   A.   I'm trying to think if that's data that
4 we have stored somewhere. All of those upgrades
5 are done at this point. So that would be
6 historical data.
7   Q.   Where would you look to find out that
8 information?
9   A.   I'm not sure that we have a system that
10 would give it at that level of specificity.
11   Q.   What about could you tell me how many
12 clients utilize Lawson Professional Services to
13 upgrade their procurement systems from version 8
14 to version 9?
15   A.   That might be a little bit easier to
16 get.
17   Q.   Where would you look to find out that
18 information?
19   A.   I would probably look in our services
20 automation system.
21   Q.   Would you be able to try to obtain that
22 information on a break?
23   A.   No, that's not something I could get on
24 a break. That would -- it would require an
25 extensive research.

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1   Q.   I will ask on the record to undertake
2   that investigation and get back to us on that.
3   MR. SCHULTZ: We will look into it
4   depending on the scope and breadth of what
5   needs to be done. We will make a
6   determination as to any objections with
7   respect to that.
8   Q.   Can you turn to page 3 of the exhibit.
9   And the Bates number on that page ends with 646.
10   A.   Yes.
11   Q.   And this page describes some pieces of
12   Lawson's upgrade approach, at least with respect
13   to the series 8 upgrade, one being server
14   technology upgrade, another being application
15   data upgrade.
16   Under the application data upgrade
17   piece, the first sentence reads, "The recommended
18   strategy is to utilize the Lawson upgrade
19   software programs to perform the data
20   migration/upgrade of the Lawson data."
21   Why does Lawson recommend that its
22   upgrade software programs be used to perform the
23   data migration to migrate data from one version
24   of the Lawson system to the next version of the
25   Lawson system?

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1   A.   Because those programs were designed
2   specifically for the purpose of unloading that
3   data from the version it's in, reorganizing it
4   into the new data structures required for the new
5   version, and loading it into the new version.
6   Without using those programs, it would
7   be an extremely manual process to move from one
8   version -- almost a reimplementation to move from
9   one version to the next.
10   Q.   Did Lawson provide upgrade software
11   programs to perform data migration with respect
12   to the upgrade of systems from version 8 to
13   version 9?
14   A.   Yes.
15   Q.   Are those upgrade programs different
16   utilities than the different data conversion
17   tools that we have been referring to earlier with
18   the file formats and that type of thing?
19   A.   Yes.
20   Q.   What are the nature of these upgrade
21   software programs?
22   A.   Again, they are utilities that -- it's
23   kind of a coordinated group of software utilities
24   that unload the data, reorganize the data, and
25   then reload the data into the new version.

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1   Q.   So with respect to upgrades from
2   version 8 to version 9, is Lawson involved in
3   assisting its clients in utilizing these upgrade
4   software programs to perform data migration in
5   upgrade of the Lawson data from the Lawson
6   version 8 systems to the Lawson version 9
7   systems?
8   A.   Sometimes. If a Lawson customer
9   chooses to help, yes, to help them.
10   Q.   Can you turn to page 6 of the exhibit.
11   A.   Yes.
12   Q.   Under the heading Prerequisite Upgrade
13   Setup, it indicates that in general, prior to an
14   upgrade, a client will need to be on a minimum
15   release level prior to being able to utilize the
16   upgrade utilities programs, et cetera, that
17   Lawson provides.
18   Why is this minimum release level
19   required by Lawson?
20   A.   Because the upgrade programs were
21   written to move the data from one specific
22   release to a different specific release. So you
23   have to be at the right starting point in order
24   for the programs to work.
25   Q.   So if a client wasn't at that minimum

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1   release level, would they need to subscribe or
2   pay an additional fee to get up to that minimum
3   release level?
4   A.   Maybe, maybe not.
5   Q.   How would you do an upgrade where a
6   client wasn't on the minimum release level
7   required?
8   A.   I think it depends on how far back they
9   are. There are -- certainly there's -- if a
10   customer just needs to have, for instance, a
11   maintenance service pack, which is something our
12   customers do by themselves frequently, often we
13   would just tell them to do that before we start
14   this project.
15   If they are not capable of doing that
16   on their own, then perhaps we would incorporate
17   that into the services of the project and take
18   that as a first step that we help them do.
19   Q.   For these system upgrades from one
20   version -- one Lawson version to another Lawson
21   version, does the Lawson Professional Services
22   organization work on-site with the clients to
23   assist with those upgrades?
24   A.   Sometimes.
25   Q.   Could you turn to page 7 of the

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1   exhibit.
2   A.   Yes.
3   Q.   There is a heading on that page
4   entitled Lawson Server Technology Upgrade, and
5   the last sentence under that paragraph says that
6   "It is highly recommended that Lawson assist with
7   this process."
8   Why is it highly recommended that
9   Lawson assist with the server technology upgrade
10   phase of an upgrade project?
11   A.   As with my prior statement, typically
12   when we make a recommendation of this nature,
13   it's because of the risk associated with the
14   event and our experience.
15   I will say that that strength of a
16   recommendation may have been made for one
17   version -- one upgrade path and not for another.
18   So it may not be a generic statement that every
19   time a customer does an upgrade we -- we highly
20   recommend that they use Lawson Professional
21   Services.
22   But for this particular 7224 to 803,
23   for iSeries, we made that -- we obviously made
24   that recommendation.
25   Q.   Can you turn to page 9 of the exhibit.

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1   A.   Yes.
2   Q.   There is a heading on that page
3   entitled Application Data Upgrade. And the text
4   under that heading reads, "The application data
5   upgrade is the second of the two major upgrade
6   tasks. The application data upgrade updates the
7   data through the use of the upgrade programs
8   Lawson provides to transform the old version data
9   to the newer version data structure."
10   Then it indicates that there are two
11   options available. Option number 1 is upgrade
12   while active option. If you turn the page,
13   option number 2 is standard using upgrade
14   programs.
15   Do you know whether with respect to the
16   S3 procurement suite upgrades, which option most
17   clients select?
18   A.   At the time of this upgrade, most
19   clients would not need to do the upgrade while
20   active. So most customers would choose the
21   standard upgrade.
22   Q.   What about with respect to upgrades
23   from Version 8 to Version 9?
24   A.   I believe it's the same answer, that
25   most customers are using a standard upgrade.

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1   Q.   Under the option number 2 on page 10,
2   standard using upgrade programs, and this is the
3   option where the upgrade project would involve
4   the use of Lawson's upgrade programs to migrate
5   data onto a test server and eventually the
6   production server, the last sentence under that
7   paragraph states that "Lawson Professional
8   Services can provide on-site support to
9   facilitate this process or a client can take
10   advantage of remote assistance that is
11   available."
12   Do you know with respect to upgrades of
13   the S3 procurement suite whether clients -- more
14   clients used the on-site option or the remote
15   support option?
16   A.   It really depends on the customer and
17   the complexity of the upgrade. I would say more
18   customers probably use the remote option.
19   Q.   Can you describe the assistance that
20   Lawson provides via the remote assistance option
21   in that circumstance?
22   A.   So with an upgrade, the vast majority
23   of the work of the upgrade is this technical
24   process of using the programs to unload the data,
25   reorganize it, and load it.

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1   Typically, when we're doing this
2   remotely, we're doing it less with the -- you
3   know, more kind of on our own and not as much
4   with the customer's interaction, not that they
5   can't watch or, you know, trade back and forth.
6   But again, we would be accessing their
7   system via VPN or WebEx, some other type of
8   Internet protocol, and physically performing
9   those programs for them as opposed to doing it
10   on-site, potentially having more engagement with
11   the customer.
12   Q.   With respect to Lawson's S3 procurement
13   suite and the upgrade from version 8 to version
14   9, does Lawson have an upgrade program that would
15   be used to migrate data from a version 8 item
16   master database to a version 9 item master
17   database?
18   A.   Yes. All of the data would be included
19   in that program -- in the programs.
20   Q.   Can you turn to page 13 of the exhibit.
21   A.   Yes.
22   Q.   And this portion of the exhibit is
23   describing system -- the system impact with
24   respect to the upgrade, and the first category of
25   impact is entitled Database Impact. And it

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1 indicates that "The following table represents
2 how much the database has changed in the new
3 release."
4   Do you see that?
5   A. Yes.
6   Q. And if you jump over to the next page,
7 under Database Impact it indicates that there
8 would be some database impact associated with
9 inventory control. That has three diamonds
10 beside, I guess, the severity of the impact. And
11 then the purchase order application also had a
12 system impact.
13   And this chart indicates that the
14 severity of the impact to the purchase order
15 application was five diamonds, and the impact to
16 the requisitions application was three diamonds.
17   With respect to system impacts that had
18 five diamonds, the text indicates that "That type
19 of impact would require a major database
20 restructuring. Extensive and complicated program
21 logic is needed to map many fields from the old
22 database, implies heavy end users testing,
23 including period endings and possible parallel
24 processing."
25   For applications that had major system

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1 impact that were assigned the five diamond level,
2 could you describe the types of services that
3 Lawson would provide the clients to assist with
4 the database restructuring at that level?
5   A. I'm not sure you're understanding what
6 the document is intending to -- to say.
7   Q. Well, what's your understanding of what
8 the document means?
9   A. The major database restructuring, what
10 it's saying there is not that the customer needs
11 to restructure the database, but that in this --
12 you know, moving from this release to that
13 release, there is major database restructuring
14 that happened.
15   And as a result, the upgrade
16 programs -- this extensive and complicated
17 programming logic is needed to map many fields
18 from the old database. That's all -- that
19 programming logic is in the upgrade programs
20 already.
21   So it's not that this is something that
22 needs to be done. It's explaining what is, you
23 know, happening or what has already been done.
24 And the implication is, I think, what's important
25 here to a customer so that they can understand

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1 that because of this major restructuring and
2 because of how significant and complex the
3 programming was to get your data from here to
4 here, you really need to test it very
5 strenuously.
6   These are the kinds of testing that you
7 would do. You would want to make sure that you
8 do your period end testing, whether that's month
9 end, quarter end, year end, and you might want to
10 do parallel processing to ensure that, for
11 instance, if you are a payroll customer, that
12 you're able to get the exact same payroll out of
13 the new version as you were the old version.
14   Q. So in connection with upgrade projects,
15 will Lawson Professional Services assist the
16 clients with the type of testing that you
17 mentioned?
18   A. We can.
19   Q. Can you turn to page 25 of the exhibit.
20   A. Yes.
21   Q. The last bullet on that page refers to
22 data verification programs for Lawson's
23 procurement or distribution suite. And it
24 indicates that "Clients should be aware that the
25 installation and subsequent running of the Lawson

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1 data verification programs by a certified Lawson
2 application consultant is a required step for any
3 client utilizing Lawson's procurement or
4 distribution suite.
5   "This will ensure the data quality
6 prior to the running of the Lawson upgrade
7 programs and is a preupgrade requirement. We
8 strongly recommend Lawson Professional Services
9 assist in the execution of these programs."
10   Why was it strongly recommended that
11 Lawson's Professional Services organization
12 assist the clients in the execution of these data
13 verification programs?
14   A. Again, because of our experience with
15 the programs themselves and the importance of
16 what they do to identify orphaned data and
17 cleanse or fix those orphaned records prior to
18 attempting to upgrade the data.
19   If we did not do this and attempted to
20 upgrade the data, the upgrade programs wouldn't
21 necessarily be able to upgrade some of the data,
22 which creates a bigger problem down the line.
23   Q. Do you know what types of data are
24 verified by these data verification programs for
25 Lawson's procurement suite that are referenced in

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1   this paragraph?
2   A.   I don't know off the top of my head.
3   It is warehouse data and purchase order data. I
4   don't know exactly which data sets that would
5   include, though.
6   MS. ALBERT: Let me have the reporter
7   mark as Raleigh Exhibit 16, a copy of a
8   document entitled Lawson Procurement
9   Punch-Out Installation Guide Version 9.0.0.X.
10   It bears production numbers L0234779 through
11   810.
12   (Thereupon, Lawson Procurement
13   Punch-Out Installation Guide Version
14   9.0.0.X was marked as Exhibit 16 for
15   identification.)
16   Q.   Can you identify the document that has
17   been marked as Raleigh Exhibit 16?
18   A.   Yeah. It's the installation guide for
19   our procurement punch-out product.
20   Q.   Does Lawson provide an installation
21   guide for each Lawson application that is
22   licensed?
23   A.   Yes. I believe so.
24   Q.   Is Lawson -- is the Lawson Professional
25   Service organization involved with implementation

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1   of procurement systems that have punch-out
2   capabilities?
3   A.   Sometimes, yes.
4   Q.   What is the Lawson Professional Service
5   organization's role in connection with such
6   implementations?
7   A.   It would be similar to the roles that
8   we play in other implementations, but for a
9   punch-out-only project, the scope of the services
10 would be significantly smaller.
11   Q.   What are the nature of the types of
12 services that you provide in connection with a
13 punch-out implementation?
14   A.   Project management services, training
15 services, configuration, testing, go live
16 support, installation obviously.
17   Q.   So with respect to configuration
18 services, what are the nature of the services
19 that would be included in connection with
20 configuration of the punch-out implementation?
21   A.   From what I understand, there is not a
22 tremendous amount of configuration required in
23 the Lawson system for punch-out. There is -- so
24 very little is the answer to your question.
25   I would say that probably the majority

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1   of the LPS services related to punch-out would be
2   more related to testing and roll-out, perhaps.
3   Q.   In connection with testing, would that
4   be testing the connection of the customer's
5   system to the vendors that it wants to punch out
6   to?
7   A.   Yes. Testing the connection and other
8   tests as well.
9   Q.   What are the types of testing that
10 would be involved with a punch-out
11 implementation?
12   A.   Typically, a customer who implements
13 punch-out is punching out to a vendor with whom
14 they have some sort of an agreement with
15 particular items and particular pricing. It's
16 not always true.
17   But we might, you know, test with the
18 customer to make sure that when we do punch out,
19 we're actually seeing the vendor's site that is
20 appropriate to our organization. So, you know,
21 that's connectivity, but it's also what do you
22 see when you actually get there. Has the vendor
23 deployed the correct items per the contract that
24 uh-huh. The customer might have with that
25 vendor.

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1   Q.   And you indicated that not very much
2   configuration was required for a punch-out
3   implementation. Is that because that the
4   application as delivered comes with -- is
5   preconfigured for a lot of functionality?
6   A.   Preconfigured? Assuming that
7   requisition self-service is already deployed for
8   the customer and all we are implementing is
9   punch-out, we're really just adding another, call
10 it transaction to an existing business process.
11   So we currently use requisition
12 self-service. We know how to do that. All we're
13 adding is the ability to click on an icon that
14 then takes us to -- punches us out to a different
15 system. So the configuration is more on the
16 vendor's system, this other, you know, Granger,
17 or whomever we're punching out to. It's really
18 more on them than it is on our software.
19   Our software just has the map that
20 allows us -- the tunnel, if you will, that allows
21 us to punch out and bring back in. That doesn't
22 really require any unique customer-specific
23 configuration.
24   Q.   Does Lawson provide specifications to
25 the vendors to assist in the implementation of a

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1   Lawson client system to punch out to that vendor
2   system?
3   A.   It depends. Lawson has a list of
4   customers with which we have established that
5   relationship, if you will. So the programming
6   has already been done to allow -- to kind of
7   build the tunnel, if you will, between the Lawson
8   system and that vendor's system.
9   In a case where a customer decides to
10 implement with a vendor who we do not -- we have
11 not yet established that pipeline, then, yes, our
12 development organization, not Lawson Professional
13 Services, but Lawson's development organization,
14 the product management or product ownership of
15 this product would get involved in helping to,
16 you know, develop that technical pipeline between
17 our system and the vendor's website.
18   Q.   That's all for that document.
19   MS. ALBERT: Let me ask the reporter to
20 mark as Raleigh Exhibit 17 a document
21 entitled Vendor Implementation Technical
22 Specifications Punch-Out Connectivity, bears
23 production numbers L0002370 through 2384.
24   (Thereupon, Implementation Technical
25   Specifications Punch-Out Connectivity

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1   was marked as Exhibit 17 for
2   identification.)
3   Q.   Are you familiar with the document that
4   is marked as Raleigh Exhibit 17?
5   A.   I'm familiar with the purpose.
6   Q.   What is the purpose of this document?
7   A.   It's exactly what you just asked me
8   before, do we provide specifications. This is
9   the specifications for the building of that
10 pipeline between the Lawson software and the
11 vendor's site.
12   Q.   So if a Lawson client has a vendor that
13 it is seeking to establish a punch-out connection
14 to and that trading partner is not already one of
15 the preestablished Lawson trading partners, then
16 Lawson will provide this specification to that
17 vendor to assist with the implementation of the
18 punch-out connection; is that correct?
19   A.   That's correct.
20   Q.   The date on the first page is
21 September 9, 2003. Do you see that?
22   A.   I do.
23   Q.   Do you know if there is a more recent
24 version of this document that's available?
25   A.   I don't know. But I doubt it.

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1   Q.   Has any -- have any of the
2   specifications for establishing punch-out
3   connectivity changed from the 2003 time period to
4   the present?
5   A.   I'm not qualified to answer that
6   question. I don't do the programming so -- but
7   I'm not aware of anything that's changed.
8   Q.   Can you turn to page 3 of the exhibit,
9   and that has the Bates number 2372.
10   A.   Yes.
11   Q.   Under integration process, item number
12 2 refers to a systems review. And the text
13 states that "This step will be performed by team
14 members from the Lawson B to B integration team
15 along with team members from the B to B partner."
16   What is meant by the Lawson B to B
17 integration team?
18   A.   That would be the development to
19 product management organization, not LPS.
20   Q.   I was going to ask if those would be
21 comprised of members of the Lawson Professional
22 Services.
23   A.   Not typically.
24   Q.   That's all for that document.
25   MS. ALBERT: Let me have the reporter

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1   mark as Raleigh Exhibit 18 a document
2   entitled e-Procurement Implementation Leaders
3   Workbook, and it bears production numbers
4   LE02260378 through 451.
5   (Thereupon, e-Procurement
6   Implementation Leaders Workbook was
7   marked as Exhibit 18 for
8   identification.)
9   Q.   Can you identify the document that has
10 been marked as Raleigh Exhibit 18?
11   A.   It appears to be the leader's guide for
12 what would be an instructor-led training course
13 on implementing e-Procurement.
14   Q.   So this would be the guide that the
15 instructor would use that provide the answers, if
16 you will, for the course; is that correct?
17   A.   Yes.
18   Q.   This course is specifically designed
19 for persons involved with e-Procurement
20 implementation; is that correct?
21   A.   Yes.
22   Q.   Was e-Procurement the prior brand name
23 that was used for a product that is currently
24 known as procurement punch-out?
25   A.   Yeah. It's the same product. I don't

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1 know what we call it now, but it is the same
2 product.
3   Q.   Do you know if there is a more current
4 version of this leader's workbook? If you see on
5 the first page, the date is January 2003.
6   A.   I don't know. But again, I doubt it.
7   Q.   Can you turn to page 2, and that Bates
8 number on that page ends with 382.
9   A.   Yes.
10   Q.   The description of this course
11 indicates that it provides the information in
12 hands-on experience necessary to configure Lawson
13 e-Procurement with 8.0.3 applications, create
14 purchase orders for transmitting, track
15 e-Procurement transactions, complete setup
16 activities with requisition self-service, and
17 execute the shopping experience.
18   Do you know if Lawson currently offers
19 a workshop that would have similar topics of
20 instruction?
21   A.   I don't believe this is a course that
22 is taught on a regularly scheduled basis, but
23 it's a course that would still be available to
24 customers who need it.
25   Q.   If you turn to page 2-7, and the Bates

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1 number on that page ends with 399.
2   A.   Yes.
3   Q.   There is a heading on that page
4 entitled Import Connector Packs. And the text
5 below that heading indicates that the connector
6 packs are predefined vendor profiles that were
7 created by Lawson.
8   Does Lawson continue to deliver
9 predefined vendor profiles of the type referenced
10 on this page?
11   A.   Of the type or these specific ones?
12   Q.   Well, of the type first.
13   A.   I don't know. I assume so.
14   Q.   Do you know if Lawson continues to
15 deliver these specific connector packs mentioned
16 on this page?
17   A.   From my recollection of the list, yes.
18 These are all still included in the pack.
19   Q.   That's all for that document.
20   MS. ALBERT: Let me have the reporter
21 mark as Raleigh Exhibit 19 a document
22 entitled Lawson Response to Request for
23 Proposal Pima County Software and
24 Implementation Services for ERP System, bears
25 production numbers L0104590 through 4828.

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1   (Thereupon, Lawson Response to Request
2   for Proposal Pima County Software and
3   Implementation Services for ERP System
4   was marked as Exhibit 19 for
5   identification.)
6   THE VIDEOGRAPHER: This marks the end
7 of videotape 5 of Hannah Raleigh. We're
8 going off the record at 2:48.,
9   (Off the record.)
10   THE VIDEOGRAPHER: This is videotape
11 number 6 in the deposition of Hannah Raleigh.
12 It is 2:53.,
13   Q.   Ms. Raleigh, can you identify the
14 document that's been marked as Raleigh
15 Exhibit 19?
16   A.   It appears to be an RFP response for a
17 particular prospect, Pima County.
18   Q.   Is -- would this particular prospect
19 fall within a particular industry vertical within
20 the Lawson organization?
21   A.   Yeah. Public sector.
22   Q.   And who would be your colleague that
23 would have similar responsibilities to you in
24 connection with the public sector?
25   A.   Bob McCray.

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1   Q.   And then you had indicated that you
2 report to a particular vice-president, and I
3 can't remember his name off the top of my head.
4 But who would be his analog, if you will, on the
5 public sector industry vertical?
6   A.   Susan Fox.
7   Q.   What is the -- which industry
8 vertical -- for what industry vertical does
9 Lawson derive the highest percentage of its
10 revenues?
11   A.   In S3, healthcare.
12   Q.   Where does the public sector fall
13 within the industry verticals with respect to
14 revenues related to the S3 product line?
15   A.   Implementation revenues?
16   Q.   Right.
17   A.   Maybe third.
18   Q.   What are all of the different industry
19 verticals with respect to the S3 product line?
20   A.   They are not all specific industry
21 verticals, but healthcare, public sector. We
22 have one called services industries, which is a
23 little bit of a catchall, and strategic human
24 capital management, which is not a vertical at
25 all. It's actually a product.

185

1   Q.   So does Lawson derive a greater

2 percentage of its services revenue for the

3 services industry vertical than the public sector

4 vertical?

5   A.   I believe so, yes.

6   Q.   Were you at all involved in this

7 response to request for proposal issued to Pima

8 County?

9   A.   No.

10   Q.   Do you know whether Lawson won the

11 award of the contract relating to this request

12 for proposal?

13   A.   I don't know, but I don't think so.

14 It's not ringing any bells.

15   Q.   Can you turn to page 6 of the RFP

16 response. The Bates number on that page ends

17 with 4600.

18   A.   Yes.

19   Q.   On this page it indicates that Lawson

20 was proposing a solution which would include the

21 procurement, requisition self-service procurement

22 punch-out, EDI for supply chain management, and

23 EDI professional for supply chain management. Do

24 you see that?

25   A.   Yes.

186

1   Q.   Can you turn to page 12 of the

2 document.

3   A.   Yes.

4   Q.   The second paragraph under the heading

5 Process Flow Indicator reads, "Lawson utilizes

6 process flow integrator and application

7 programming interfaces for the development of

8 interfaces between Lawson and third-party

9 applications. Interfacing with external systems

10 is facilitated by using our standard APIs that

11 may require interface development during

12 implementation."

13   Do you know in connection with

14 implementations relating to the S3 procurement

15 solutions, whether the Lawson Professional

16 Service organization will develop interfaces as

17 mentioned in this paragraph?

18   A.   Sometimes we will.

19   Q.   Can you turn to page 17. That Bates

20 number on that page ends with 4611.

21   A.   Yes.

22   Q.   This page also discusses the process

23 flow integrator, and the second bullet point at

24 the top of the page indicates that "For the most

25 robust conversion integration requirements,

187

1 Lawson offers a disparate data integration tool

2 known as process flow integrator."

3   Underneath that bullet it indicates

4 that "This PFI can run data integration in either

5 real time or batch mode and is a full-featured

6 enterprise application integration tool that may

7 integrate both Lawson to non-Lawson systems as

8 well as non-Lawson to non-Lawson systems."

9   Next it indicates that "PFI is capable

10 of integrating virtually any disparate data

11 types, including standard integration formats,

12 such as flat files, EDI, FTP, HTTP, XML, CSV, EDI

13 A sync and by sync."

14   Next it indicates that PFI -- with

15 respect to PFI, "Lawson data validation rules

16 applies to every transaction as they would for an

17 online entry. The client has the option to set

18 for hard stop or continue and invalidate as

19 encountered with errant lines, line items being

20 held in a separate queue for examination.

21   "Upon data correction, the job does not

22 have to be rerun from the beginning. Only

23 offending transactions need to be processed."

24   Do you know if this process flow

25 integrator is used in connection with

188

1 implementations of S3 procurement systems?

2   A.   Yes, it can be.

3   Q.   What would be -- what situations would

4 you use process flow integrator versus those

5 other data conversion tools that Lawson provides?

6   A.   There's a few differences. One, not

7 every customer owns process flow integrator. So

8 as it mentions here, this is a more robust

9 solution that not every customer would purchase.

10 Customers -- some customers don't have this

11 option.

12   For customers who have purchased this

13 product, they might use it for any number of

14 different interface needs to move data, you know,

15 between the Lawson procurement suite and whomever

16 they interface with, whether that could be a

17 surgery system, OR inventory, whatever their

18 interface needs might be. They could use this.

19   I don't have any specific examples of

20 any recent customers to offer you.

21   Q.   Can you turn to page 20 of the RFP

22 response. That Bates number on that page ends

23 with 4614.

24   A.   Yes.

25   Q.   So under the heading Data Migration and

189

1   Data Conversion, in the third paragraph it
2   indicates that Lawson was including the following
3   solutions within the response to the RFP: 1,
4   Lawson standard application programming
5   interfaces library included with the base system;
6   2, Lawson add-ins for MS office; 3, Lawson
7   process flow integrator.
8   So can you describe -- so we have been
9   describing the process flow integrator. What are
10   the Lawson standard application program
11   interfaces that are used for data migration and
12   data conversion efforts as it relates to S3
13   procurement systems?
14   A.   Well, there are a variety of them. I
15   don't know -- I can't list them all for you.
16   Q.   Do you know what some of them are or
17   what they relate to?
18   A.   It could -- they could relate to
19   loading of the item master. It could relate to
20   loading of par locations, vendor agreements we
21   have talked about previously, shopping lists.
22   Vendor -- well, that's really not
23   supply chain as much as it is AP. I'm sure there
24   are others.
25   Q.   Is there a Lawson standard API

190

1   associated with loading of item master data?
2   A.   Yes, I believe so.
3   Q.   Under those bullets, the next sentence
4   reads, "Data migration and conversions refer to
5   any efforts associated with the analysis,
6   cleansing, loading, and reconciling of current or
7   historical data from other systems into Lawson
8   systems whether by manual or programmatic
9   methods."
10   The next sentence indicates that
11   "Lawson has assumed in this proposal the
12   migration of financial procurement and human
13   resources data elements as defined in Section
14   3.6."
15   Down below that, the last sentence of
16   the next paragraph indicates that "Typically our
17   approach to data conversion is one of joint
18   ownership of the data migration tasks with the
19   extraction and cleansing of data from the Legacy
20   system is the responsibility of our customer."
21   In what respects are the data
22   conversion efforts joint ownership between Lawson
23   and the client?
24   A.   Again, there is different tasks
25   associated with the overall process. Some of

191

1   those tasks Lawson would be responsible for or
2   have ownership for, for instance, providing those
3   APIs, providing guidance or assistance with
4   understanding the APIs, providing plan --
5   conversion planning assistance or, you know,
6   advice on how to go about the process of
7   converting data.
8   Q.   The next paragraph below what I just
9   read reads, "Lawson typically supports our
10   customers by providing tools and consulting to
11   assist in the mapping of data and transfer of
12   Legacy data tables to equivalent Lawson tables,
13   training in the use of the tools, and consulting
14   on the verification of the migrated data."
15   So those would be aspects of a data
16   migration and conversion process that Lawson
17   takes ownership of?
18   A.   Sometimes.
19   Q.   What types of services does Lawson
20   provide that relate to the verification of
21   migrated data?
22   A.   Commonly, what we will provide is
23   advice on how to verify the data. So for
24   instance, which reports could be run you know,
25   which -- you know, how to read the reports that

192

1   you run to assess whether or not the data is
2   correct, that sort of thing.
3   Q.   Can you turn to page 23 of the exhibit.
4   A.   Yes.
5   Q.   There is a chart on this page that has
6   certain activities, and then it indicates a party
7   that has, I guess, the primary responsibility for
8   that activity and then a party that would assist
9   in the activity.
10   It includes tasks such as extract data
11   from Legacy applications, data migration
12   workshops, migration strategy and process
13   description, migrate data, data cleansing and
14   rationalization, and training in data migration
15   tools.
16   And the chart continues on to the next
17   page and includes tasks including test load
18   sample data, test data within critical business
19   processes, full migration systems test, full
20   migration full scale test, and live migration.
21   For all tasks for which Lawson does not
22   have primary responsibility, it's assisting the
23   customer, correct?
24   A.   That's what it says on the page, yeah.
25   Q.   Is this a typical chart of

193

1   responsibilities as far as a data migration and

2   conversion effort associated with an S3

3   procurement system implementation?

4   A.   To the best of my knowledge, that's

5   fairly typical.

6   Q.   Will the chart change depending on

7   particular clients?

8   A.   It could. This chart has more steps

9   listed than the charts that I'm used to seeing in

10   our contracts is why I say it's fairly typical,

11   not that -- it just has more listed than we

12   typically list in our statements of work when we

13   actually sign a contract.

14   Q.   Would the steps included in this chart

15   that you would not typically see or which you're

16   not familiar with as being included in a data

17   conversion effort?

18   A.   Sorry. Let me clarify. All of the

19   steps here are included in a data conversion

20   effort. It's just they're not always explicitly

21   stated in our documentation as -- with

22   responsible and assist associations linked to

23   them.

24   So for instance, in fact, everything on

25   the second page of this chart, all of these are

194

1   again included in the conversion or migration

2   process probably for every customer. However, I

3   haven't typically seen these enumerated in this

4   way in our contracts.

5   Q.   What is the difference between a full

6   migration systems test and a full migration full

7   scale test?

8   A.   It probably is pointing towards those

9   two different kinds of testing. Remember there's

10   a lot of different ways of referring to tests.

11   But the systems test to me would mean a test with

12   all of the data where we're testing processes

13   both within Lawson and processes that reach

14   outside of Lawson through interfaces or reports,

15   things like that.

16   And A full scale test might include all

17   of those processes but also perhaps include end

18   user participation to validate that the business

19   processes are appropriate for the business or

20   some other element of it. Or it might include

21   stress testing of the system by putting

22   additional users on the system to ensure it can

23   handle the load.

24   Q.   With respect to the task relating to

25   data cleansing and rationalization, this chart

195

1   indicates that Lawson had proposed that the

2   county have primary responsibility for that task

3   and then Lawson would assist.

4   Under key assumptions, the last

5   assumption indicates that any Lawson rework

6   related to poor data quality will result in a

7   request under the project change control

8   procedure.

9   Have you been involved in a situation

10   where a client had primary responsibility for

11   data cleansing and rationalization, but then

12   Lawson had to come in and rework the data because

13   of poor data quality?

14   A.   Yes, but not necessarily rework the

15   data so much as maybe rework the project plan or

16   do additional work because of -- so for instance,

17   if they had incorrect data and we didn't know

18   that and we moved into a testing cycle and we

19   found it there, we might need to redo that

20   testing cycle once the data has been cleaned up.

21   So it doesn't necessarily mean that

22   we're reworking the actual data.

23   Q.   Can you turn to page 79 of the exhibit.

24   That page has the production number ending with

25   4673.

196

1   A.   Yes.

2   Q.   Under implementation phase one, there

3   is a bullet referring to integration data,

4   conversion, and customization. It indicates that

5   Lawson was proposing to provide the county with

6   two resources relating to that task.

7   Do you know what the typical resource

8   level is in connection with integration data

9   conversion and customization efforts relating to

10   an S3 procurement system implementation?

11   A.   It really depends. That's three very

12   different areas of the project, integration,

13   conversion, and customization. The complexity of

14   any of those three could drive that number to be

15   low or high.

16   Q.   So you might have more than two

17   resources for a particular project and you might

18   have less than two resources for a particular

19   project?

20   A.   We might. You -- we might have zero

21   resources working on, for instance, data

22   conversion but six resources working on

23   customizations that have nothing to do with data

24   conversion. So it's not a particularly specific

25   notation there.

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1   Q.   Can you turn to page 115 of the
2   exhibit.
3   A.   Yes.
4   Q.   Under the heading Data Migration, the
5   second paragraph indicates, "Our standard
6   approach is that the extraction and cleansing of
7   data is the customer's responsibility. Our
8   standard approach will be utilized for this
9   project based on the fact that the county is
10   currently using Legacy systems. However, Lawson
11   will assist with extraction and mapping. Lawson
12   will assist with the data cleansing effort for
13   the vendor master and item master."
14   So Lawson can provide assistance to
15   clients with respect to data extraction and
16   cleansing and mapping efforts for the vendor
17   master and item master if the customer wants such
18   services; is that correct?
19   A.   This paragraph contradicts itself. So
20   I'm not sure what the true intent of the
21   paragraph was. However, it is possible that
22   Lawson could help in those areas. But those are
23   not areas, which we typically help our customers
24   with.
25   Q.   Well, in connection with this proposal,

198

1   Lawson proposed that the tasks that it was going
2   to -- or the services it was going to provide to
3   the client in connection with this data migration
4   effort would be collect sample data for
5   prototyping, enter manually into the initial
6   data.
7   So Lawson can provide services to
8   customers relating to collecting sample data and
9   entering it into a data version of a vendor
10   master and item master; is that correct?
11   A.   It could.
12   Q.   And then have you ever been involved
13   with a project where Lawson performed such
14   services?
15   A.   Probably. I can't think of one in
16   particular.
17   Q.   Lawson also proposed to collaborate
18   with the IT team responsible and to ensure timely
19   and complete data mapping, and we have talked a
20   little bit about Lawson's services in connection
21   with data mapping.
22   And the next bullet says that Lawson
23   was going to provide the data mapping tools. I
24   think you indicated that there are data mapping
25   tools that Lawson has that are specifically

199

1   related to data mapping with respect to the item
2   master of the inventory control application,
3   correct?
4   A.   Yes. Again, the term "tools" may or
5   may not mean something, an actual software tool.
6   Q.   It could mean the file formats?
7   A.   Right.
8   Q.   And Lawson also proposed to execute
9   cross-functional workshops to define the data
10   migration requirements and mapping for the county
11   in connection with this proposal.
12   I think you said that's fairly typical
13   as far as a service that Lawson would provide for
14   a data migration effort in connection with an
15   implementation project; is that correct?
16   A.   Yes.
17   Q.   Then Lawson would carry out the
18   training and the data migration environment
19   management processes and tools. That would also
20   be a fairly typical service that Lawson would
21   provide in connection with a procurement system
22   implementation project, correct?
23   A.   Yes.
24   Q.   Here Lawson proposed to support the
25   customer's IT responsible in executing initial

200

1   tests on samples of extracted and cleansed data.
2   Can you describe the types of services that
3   Lawson would provide relating to that task?
4   A.   What this probably means is that once
5   the customer has extracted and cleansed their
6   data and they attempt to load it, load a sample
7   of that data into the system the first time, we
8   will provide support to them should something go
9   wrong, should it not work properly.
10   Q.   The next bullet, even though it
11   indicates that these were services Lawson would
12   provide, it seems to suggest that the county was
13   going to be responsible for confirming and
14   validating converted data in this proposal. Then
15   on the next page -- that's the end of, I think,
16   the services description.
17   On the next page there are some
18   different tests that are described relating to
19   the data migration efforts. I think we talked
20   about the systems test and the --
21   A.   Full scale test.
22   Q.   Full scale test. What is the nature of
23   the preliminary test of the full data migration
24   that occurs prior to the system test?
25   A.   So if you can imagine again a customer

201

1 has extracted and cleansed their data and they
2 are ready to begin trying to load it. They may
3 begin with a test that loads just a small sample
4 of the data to ensure that, generally speaking,
5 they have the right fields in the right columns.
6 However, before we attempt to do a
7 systems test for which we will need all the data,
8 we would do what they are referring to here as
9 the preliminary test of the full data migration
10 to load the entire file into the system to ensure
11 that not only do which have the right data in the
12 right columns, but every piece of data that we're
13 loading is able to be loaded.
14 So as we said before, maybe it requires
15 nine digits and, uh-oh, we have one record that
16 has 10 digits, we want to know that, that that
17 record isn't going to load, and that would be
18 confirmed with this full data load test.
19 Q.   Can you turn to page 122 of the
20 exhibit.
21 A.   Yes.
22 Q.   Under item 2.8, that item relates to
23 integration and conversion development plan. It
24 says the objective of that step, if you will, is
25 to develop a data migration and integration

202

1 strategy that identifies the requirements and
2 approach for the development of interfaces, data
3 conversion files, and any other development work.
4 Under that phase, the first task listed
5 is to provide data conversion template. It
6 indicates that Lawson had the responsibility for
7 that task.
8 Is it fairly typical that in connection
9 with an S3 procurement system implementation,
10 that data -- that Lawson would have the
11 responsibility of providing the data conversion
12 template?
13 A.   Yes.
14 Q.   And then the second task listed is to
15 conduct a mapping and integration session for
16 conversions and interfaces. This chart indicates
17 that Lawson had proposed to have responsibility
18 for conducting that task.
19 Is it typical in an implementation of
20 an S3 procurement system that Lawson would have
21 responsibility for that task?
22 A.   Yes.
23 Q.   Then the next task in this phase is to
24 document all conversion programs required in the
25 amount of Legacy data to convert. The chart

203

1 indicates that Pima had primary responsibility
2 for that task and Lawson would assist.
3 Is that typical in an S3 procurement
4 system implementation, that Lawson would assist
5 the client with that task?
6 A.   I think it's typical that the customer
7 would have primary ownership. Whether or not
8 Lawson provides assistance is somewhat variable.
9 Q.   In what circumstances will Lawson
10 provide assistance?
11 A.   Perhaps, again, with customers who are
12 looking for us to give them advice on what other
13 customers have done. But these decisions are
14 very much the customer's specific decisions.
15 Q.   Why are these decisions customer's
16 specific decisions?
17 A.   It's -- the customer is responsible for
18 their data. So it's up to them to determine what
19 data they want to convert and how much of it they
20 want to convert.
21 We have some guidelines or we can tell
22 a customer what we see typically, but ultimately,
23 it's the customer's system, it's their data, and
24 it's up to them to determine how much of it they
25 want and where they want to bring it from, if at

204

1 all.
2 Q.   Then the next task is listed as
3 documenting all interface programs required. The
4 proposal indicates that Pima was to have primary
5 responsibility and Lawson was to assist.
6 Is that typical in connection with an
7 implementation of an S3 procurement system, that
8 Lawson will assist the customer with documenting
9 the interface programs required?
10 A.   Again, it's typical that the customer
11 would have primary ownership and whether or not
12 they need Lawson's assistance would vary widely.
13 Q.   Under the execute phase on that page,
14 item 3.1 relates to integration design. And the
15 objective of that phase, or stage, if you will,
16 is to complete the development and unit testing
17 of any conversions, interfaces, files, custom
18 reports or other development activity required
19 for the project.
20 There are some tasks listed in the
21 integration and design stage: complete data
22 mapping, develop final data extract and mapping
23 programs, validate data integrity and system
24 tests, and complete custom reports.
25 The proposal indicates that Lawson

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1   would provide assistance to the client. I guess

2   it's actually with the first and third and fourth

3   tasks. Is it typical in connection with an S3

4   procurement system implementation that Lawson

5   will assist the client in performing those tasks?

6   A.   It's typical that Lawson would assist

7   in the data mapping task. It would vary as to

8   whether or not Lawson participate -- or assisted

9   in or participated in all in validating data

10   integrity or in completing custom reports.

11   Q.   Under stage 3.3, which relates to

12   develop system test plan, the objective of that

13   stage is to create a system test plan that will

14   be used to final test the entire system,

15   including conversions, interfaces, custom reports

16   and modifications prior to the final cut over to

17   production.

18   And it indicates that Lawson has

19   responsibility to develop the system test plan

20   and review the test methodology with the client.

21   Is it typical in an S3 procurement system

22   implementation that Lawson will have

23   responsibilities for development of the system

24   test plan?

25   A.   It may be common but not -- it happens,

206

1   but I wouldn't say it's even better than

2   50 percent of the cases, so ...

3   Q.   Under step 3.5, system test, the

4   objective of that step is to verify the Lawson

5   system, including conversions, interfaces, and

6   other development work, is able to execute and

7   support the Pima business processes in a

8   production environment. The first task is to

9   conduct the system test, and Lawson had the

10   responsibility for that step.

11   Is it typical in connection with S3

12   procurement system implementations that Lawson

13   will have responsibility to actually conduct the

14   system test?

15   A.   No.

16   Q.   Does Lawson typically assist the client

17   in conducting the system test?

18   A.   Yes.

19   Q.   That's all for that exhibit.

20   MS. ALBERT: Let me have the reporter

21   mark as Raleigh Exhibit 20 a copy of a

22   document entitled Lawson Response to Public

23   Health Trust/Jackson Health System, bears

24   production numbers L0096023 through 6329.

25   (Thereupon, Lawson Response to Public

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1   Health Trust/Jackson Health System was

2   marked as Exhibit 20 for

3   identification.)

4   Q.   Are you familiar with the document that

5   has been marked as Raleigh Exhibit 20?

6   A.   I haven't read the whole thing, but

7   yes, I'm familiar with it.

8   Q.   And what is it?

9   A.   It is a -- it's an RFP response for a

10   particular customer for the implementation. I

11   don't know if this includes products as well.

12   Certainly it is for the implementation of our

13   system.

14   Q.   Did you assist in developing this

15   proposal?

16   A.   No.

17   Q.   Did you assist in connection with the

18   implementation project?

19   A.   Yes.

20   Q.   And if you turn to page 91, that's

21   on -- the Bates number on that page ends with

22   6117.

23   A.   Uh-huh.

24   Q.   Is that your resume that is included in

25   this --

208

1   A.   Yes.

2   Q.   -- proposal?

3   And what was the nature of your

4   involvement on this project?

5   A.   My involvement is ongoing. I am the

6   practice director overseeing this implementation,

7   so I serve as an escalation point for the team --

8   for my team and for the customer team and oversee

9   many aspects of the implementation on the

10   services that we provide.

11   Q.   Did Lawson compete against anyone in

12   connection with this particular RFP?

13   A.   Lawson competed against other software

14   companies. As far as the services, the

15   implementation services, I believe the customer's

16   decision was joint. If they chose Lawson the

17   product, they also chose Lawson Professional

18   Services. I don't believe there was a separate

19   competition related to the services.

20   Q.   Do you know what software vendors

21   Lawson competed with in connection with this RFP?

22   A.   Oracle and SAP.

23   Q.   Lawson received the award of the

24   contract --

25   A.   Yes.

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1   Q.   -- for this particular project; is that

2   correct?

3   A.   Yes.

4   Q.   Can you turn to page 38 of the

5   document. The Bates number on that page ends

6   with 6064.

7   A.   Yes.

8   Q.   Did the project scope include the

9   procurement suite and specifically the purchase

10   order requisitions inventory control, requisition

11   self-service, case cards and EDI, standard and

12   Web methods applications referenced on this page?

13   A.   Case cards was not implemented, but the

14   rest of these items were implemented.

15   Q.   What is the stage of the project

16   currently?

17   A.   It's still in progress. The

18   procurement and financial systems went live in

19   November. The HR payroll system is going live

20   this month.

21   Q.   Can you turn to page 1 of the proposal.

22   Bates number on that page ends with 6027.

23   A.   Yes.

24   Q.   The second sentence on this page states

25   that "Lawson as prime contractor is partnering

211

1   contract with Velocity, or is the contractual

2   relationship with Velocity strictly between

3   Lawson and Velocity?

4   A.   It's strictly between Lawson and

5   Velocity. It was not included in my prior count

6   because of the fact that we don't consider this

7   our hosting customer.

8   Q.   The other customers that you referred

9   to earlier for which Lawson provides hosted

10   procurement systems, Jackson -- I think you

11   said -- did you say?

12   A.   I did not include Jackson.

13   Q.   You said Appalachian and Siemen

14   Medical. Oh, no. One of them was Fayette?

15   A.   Yes.

16   Q.   Okay. So those 13 that you referred to

17   earlier as being supply chain management systems

18   that Lawson hosts, Jackson was not included

19   within that group of 13?

20   A.   That's correct.

21   Q.   How many circumstances or would you be

22   able to determine the number of clients for which

23   Lawson has subcontracted with another service

24   provider to provide hosting services to the

25   client for supply chain management-type systems?

210

1   the Siemens Medical Solutions to provide a highly

2   integrated ERP solution that is hosted remotely

3   out of data center."

4   Is this -- you didn't reference this

5   client earlier as being one that you're familiar

6   with that had hosted services. Is this another

7   Lawson client that -- for which Lawson is

8   providing hosted services?

9   A.   Well, yes and no. This document

10   reflects a point in time at which we were

11   partnering with Siemens Medical Solutions.

12   However, later in the sales process, prior to the

13   contract being awarded to Lawson, our

14   relationship with Siemens Medical Systems was

15   dissolved.

16   And so we contracted with Velocity

17   Technical Services to provide the hosting for

18   Jackson. So Lawson -- yes and no, right?

19   So Jackson has a contract with Lawson

20   to provide hosting. However, the actual provider

21   of the hosting is not Lawson; it is Velocity.

22   Q.   But so is Velocity a subcontractor to

23   Lawson in that situation?

24   A.   Yes.

25   Q.   Does the client have a separate

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1   A.   This is the only one that I'm aware of.

2   There's only two that I'm aware of at all, and

3   this is the only one that includes supply chain.

4   Q.   So where Velocity is a subcontractor to

5   Lawson, Lawson has the contractual

6   responsibilities to the client to provide the

7   hosting services that are included in the, I

8   guess, statement of work or contract between

9   Lawson and the client; is that correct?

10   A.   Yes.

11   Q.   Can you turn to page 19 of the RFP

12   response.

13   A.   Yes.

14   Q.   If I'm reading this RFP response

15   correctly, is a question that the client asked on

16   the left-hand column of the chart and then

17   Lawson's response to that question in the

18   right-hand column of the chart?

19   A.   That's how I would understand it.

20   Q.   So Jackson asked Lawson to describe the

21   process and the approximate timing associated

22   with performing automated data conversion of

23   master files, such as chart of accounts and item

24   master in a teaching hospital environment with

25   volume comparable to JHS.

213

1   And Lawson responded that "Lawson has
2   many years of experience converting health
3   information systems. We have performed thousands
4   of data conversions of foreign systems. Over the
5   years we have developed many tools that assist in
6   data conversions and uploads.
7   So with respect to the thousands of
8   data conversions of foreign systems, should I
9   interpret that that Lawson has performed
10   thousands of data conversions that related to
11   conversions of item masters, or would those
12   thousands include conversions related to chart of
13   accounts and item masters?
14   A. I would say you could conclude that it
15   either refers to -- no. It refers to data
16   conversion of master files in general. Chart of
17   accounts and item master were examples of master
18   files.
19   Q.   So within that group of thousands of
20   data conversions, would there be any way to tell
21   how many of those data conversions related to the
22   item master conversions?
23   A.   No. That's -- I don't think that's a
24   piece of information we would have available.
25   Q.   The tools that assist in data

214

1   conversions and uploads, those are the tools that
2   we have been discussing throughout the course of
3   the day, correct?
4   A.   That's correct.
5   Q.   I can't remember if I asked you this
6   before, but are there any differences in an S3
7   procurement system implementation where Lawson or
8   a Lawson partner is hosting the system versus an
9   implementation that takes place at the client's
10   facility?
11   A.   What type of differences are you
12   referring to?
13   Q.   Well, any type of difference. I'm just
14   trying to say at a high level if you will, are
15   there any, you know, different phases of the
16   project or any tasks that differ where you're
17   conducting an S3 procurement system
18   implementation for a system that Lawson is going
19   to host or a Lawson partner is hosting versus a
20   circumstance where the system is going to reside
21   at the client's facility?
22   A.   I would say the only difference could
23   be in who actually loads the system onto the
24   server at the very outset of the project. In a
25   case where Lawson, or in this case Velocity, is

215

1   hosting the system, Velocity will often perform
2   the initial installation versus Lawson
3   Professional Services performing that
4   installation.
5   Past the installation of the software
6   on to the server, there are no substantive
7   differences in the way that we implement.
8   MS. ALBERT: The videographer has
9   indicated that we need to take a break to
10   allow the tape change.
11   THE VIDEOGRAPHER: This is the end of
12   videotape 6 of Hannah Raleigh. We're going
13   off the record at 3:50.,
14   (Off the record.)
15   THE VIDEOGRAPHER: This is videotape 7
16   of Hannah Raleigh. We're back on the video
17   record at 3:52.,
18   Q.   Can you turn to page 51 of the exhibit,
19   please.
20   A.   Yes.
21   Q.   Under the heading Conversions, it
22   indicates that the conversion data identified
23   below for this project is considered in the scope
24   of the project. Jackson will be responsible for
25   extracting all data from non-Lawson systems.

216

1   Lawson will work with Jackson to load the data
2   using standard Lawson conversion programs out of
3   the box.
4   Down below it indicates that Lawson
5   will provide assistance and guidance --
6   assistance, guidance, and direction to Jackson
7   regarding conversions, modifications, and
8   interfaces.
9   Did Lawson provide that assistance,
10   guidance, and direction as indicated?
11   A.   Yes.
12   Q.   And the next bullet says, "Jackson will
13   be responsible for data conversion." The last
14   sentence under that bullet reads, "Time has been
15   included in this proposal for Lawson to assist
16   Jackson resources in functional data mapping."
17   Did Lawson assist Jackson resources in
18   functional data mapping in connection with this
19   implementation?
20   A.   Yes.
21   Q.   Down below that there is a table. It
22   has various conversion files that were included
23   in the proposal, one being the vendor master. Do
24   you know whether the vendor master was one of the
25   files that was involved in the conversion project

217

1 for Jackson?

2 A. Yes, it was.

3 Q. On the next page it indicates that the

4 item master was included or was proposed for

5 inclusion as one of the conversion files included

6 in the scope of the conversion effort for

7 Jackson.

8 Was that, in fact, the case that the

9 item master was included in the conversion

10 efforts for Jackson?

11 A. Yes.

12 Q. Then a little bit below item master,

13 there is a listing for PO vendor master. Do you

14 see that?

15 A. Yes.

16 Q. Was the PO vendor master file included

17 within the scope of the conversion efforts and

18 services that Lawson provided to Jackson?

19 A. Yes.

20 Q. Can you turn to page 78 of the

21 document.

22 A. Yes.

23 Q. This table identifies certain

24 deliverables and the owner and then sister

25 collaborator in the deliverables. One

218

1 deliverable is identified as software install,

2 and it indicates that Lawson was the owner of

3 that task.

4 Is that -- was that, in fact, the case,

5 that Lawson had responsibility for the software

6 installation for Jackson?

7 A. Lawson did, but Velocity technical

8 services ultimately performed the installation on

9 our behalf.

10 Q. Did Lawson provide functional project

11 team training to Jackson as indicated in the

12 proposal?

13 A. No. And the reason for that, if that's

14 your next question, is because after the time

15 that this document was written, there were

16 changes in the proposal in the ultimate contract.

17 So the ultimate contract differed from this

18 original proposal.

19 Q. Did Lawson provide any project team

20 training to Jackson in connection with the

21 implementation project for Jackson?

22 A. Not formal project team training in the

23 way that we have discussed previously today.

24 Q. Did Lawson provide conversion workbooks

25 to Jackson as indicated in the proposal?

219

1 A. Yes.

2 Q. Did Lawson provide a conversion

3 workshop to Jackson as indicated in the proposal?

4 A. Yes.

5 Q. Did Lawson provide an integration

6 workshop with API file layouts to Jackson as

7 indicated in the proposal?

8 A. I believe so.

9 Q. Can you turn to the next page. The

10 bottom chart on that page has certain tasks that

11 are identified as being -- both Lawson and

12 Jackson having ownership and collaboration

13 responsibilities.

14 Did Lawson either have the primary --

15 well, was Lawson primarily responsible or did

16 Lawson collaborate with Jackson in providing the

17 advanced conversion workshop as identified in the

18 proposal?

19 A. I would say we collaborated or

20 assisted.

21 Q. Did Lawson collaborate or assist

22 Jackson in documenting required identified

23 interface programs in the estimated work effort

24 to complete the interfaces as indicated in the

25 proposal?

220

1 A. I should have clarified before. Your

2 questions are specific to the procurement

3 implementation. That's right, right?

4 Q. Okay. Well, I can say they are, yes.

5 With respect to the implementation of the S3

6 procurement system, did Lawson assist or

7 collaborate with Jackson in documenting the

8 required identified interface programs and the

9 estimated work effort to complete the interfaces?

10 A. Yes, for some of them.

11 Q. And did Lawson assist and collaborate

12 with Jackson in coding program logic to map data

13 from Legacy or non-Lawson system to Lawson API

14 file layouts for both conversions and Lawson

15 inbound interfaces as indicated in the proposal?

16 A. Not for the procurement suite. I don't

17 believe so.

18 Q. And what about with respect to coding

19 program logic to map data from non-Lawson systems

20 per layouts, did Lawson assist or collaborate

21 with Jackson in performing that task with respect

22 to, I guess, outbound conversion and interface

23 file maps?

24 A. I don't believe so, not for the

25 procurement implementation.

Raleigh, Hannah   3/4/2010 12:00:00 AM

221

1   Q.   Can you turn to page 232.

2   A.   Yes.

3   Q.   Do you see on this page that the

4   proposed total price of the project to Jackson

5   was $22,801,525?

6   A.   Yes, but that's not just the cost of

7   the project.

8   Q.   What does that total price include?

9   A.   That includes the items listed on the

10   top of page 233, the license fees, support

11   maintenance fees, implementation fees, hosting

12   fees, third-party maintenance fees, third-party

13   license fees, performance bond costs, payment

14   bond costs.

15   Q.   So the fees related to the

16   implementation were $6,324,732?

17   A.   The proposal, not the actual fees

18   necessarily, but this was the proposal.

19   Q.   Do you know what the actual fees were?

20   A.   The project is not complete yet.

21   Q.   What are the actual fees that Jackson

22   has paid to date?

23   A.   For just the procurement

24   implementation?

25   Q.   Well, is there any way to determine the

222

1   implementation fees associated with just the

2   procurement aspect of the implementation project?

3   A.   Not really, because it's a fixed fee

4   implementation. So we were paid on the basis of

5   particular milestones which would have included

6   consulting for more than one of the areas.

7   Financials and procurements, the

8   milestones were tied together. So for every

9   milestone, it would have included both the

10   financial consulting and the procurement

11   consulting.

12   Q.   That's it for that document.

13   MS. ALBERT: Let me ask the reporter to

14   mark as Raleigh Exhibit 21 a document

15   entitled Lawson Professional Services

16   Statement of Work for Jackson, bears

17   production numbers LE00645360 through 461.

18   (Thereupon, Lawson Professional

19   Services Statement of Work for Jackson

20   was marked as Exhibit 21 for

21   identification.)

22   Q.   Can you identify the document that has

23   been marked as Raleigh Exhibit 21?

24   A.   Yes. It's a statement of work for the

25   project at Jackson Health System.

223

1   Q.   Can you turn to page 15 of the

2   document.

3   A.   Yes.

4   Q.   Under the heading Data Migration and

5   Conversion Scope, item 3.5.1.1 refers to master

6   file and configuration table value builds.

7   The text below that indicates that "The

8   data to be converted will be identified during

9   the design phase. The loss and functional

10   consultants will provide assistance with data

11   mapping support, data loading support, and

12   executing uploads via Lawson's add-in tool to

13   build the required master files and

14   configuration/table -- or /setup table values."

15   Did the Lawson Professional Services

16   consultants provide this assistance as indicated

17   in the statement of work?

18   A.   For the procurement implementation?

19   Q.   Yes.

20   A.   Yes.

21   Q.   And did Lawson provide the customer

22   with the Lawson conversion manuals and file

23   layouts as indicated in the paragraph below?

24   A.   Yes.

25   Q.   Did Lawson provide a conversion work

224

1   session to review the Lawson standard conversion

2   programs and conversion process to Jackson?

3   A.   I believe so.

4   Q.   Can you turn to page 16.

5   A.   Yes.

6   Q.   This table relates to responsibilities

7   for master file and configuration table value

8   builds. And one activity is data migration

9   workshops, and this table indicates that Lawson

10   would be responsible to provide cross-functional

11   workshops to define the data migration process

12   and mapping required.

13   Did Lawson, in fact, provide those data

14   migration workshops to Jackson?

15   A.   I believe so.

16   Q.   The next activity listed in the table

17   is migration strategy and process description.

18   Did Lawson provide Jackson with migration

19   strategy and process description?

20   A.   Yes.

21   Q.   Down below there is a task identified

22   as training and data migration tools. And it

23   indicates that standard training/education

24   courses will be delivered by Lawson qualified

25   staff.

225

1   Did Lawson, in fact, provide these
2   training and educational courses relating to data
3   migration tools to Jackson?
4   A.   For the procurement implementation,
5   right?
6   Q.   Yes.
7   A.   I believe so.
8   Q.   The last task on that page is
9   identified as test load sample data. It
10   indicated that the client would be responsible
11   for providing the sample data and that Lawson
12   would be responsible for executing the load of
13   the test data.
14   Did Lawson, in fact, provide the
15   execution of the load of the test data for
16   Jackson in connection with this project?
17   A.   I believe so.
18   Q.   Then can you turn to page 17.
19   A.   Yes.
20   Q.   The next activity is identified as
21   production data load. And it indicated that
22   Lawson was responsible for executing the load,
23   the data load in connection with this task.
24   Did Lawson, in fact, perform those
25   services for Jackson?

226

1   A.   Insomuch as we pushed the button? Yes.
2   I think that's the way that it is defined here.
3   We physically loaded the data. We didn't -- the
4   data was handed to us, and we loaded it into the
5   system. I do believe that's true, for the
6   procurement system.
7   Q.   Under full migration systems test it
8   indicated that Lawson would have responsibility
9   for that task. Did Lawson, in fact, perform
10   services relating to a full migration systems
11   test for Jackson in connection with this
12   implementation project?
13   A.   Yes.
14   Q.   And did Lawson also provide the
15   full-scale -- full migration test that is
16   identified in this table for Jackson?
17   A.   I believe so, yes.
18   Q.   It also indicated that Lawson was
19   responsible for the live data migration. Was
20   Lawson, in fact, responsible for the live data
21   migration for the Jackson system in this project?
22   A.   Yeah, I believe so. Again, in terms of
23   actually taking the data provided to us and
24   loading into the system.
25   Q.   Down below that there is a table

227

1   identified as master file and configuration table
2   value builds in scope. Do you know what that
3   title means?
4   A.   Yes.
5   Q.   What does that mean?
6   A.   It means that these are the master
7   files and the -- or the configuration tables that
8   are included in the scope of the project, whether
9   Lawson is responsible or the customer. These are
10   the ones that are included in the scope of the
11   project.
12   Q.   So the scope of the project for Jackson
13   included the vendor master, the item master, the
14   vendor catalog; is that correct?
15   A.   That's correct.
16   Q.   And with respect to the vendor catalog,
17   Lawson indicated that catalog information is part
18   of Lawson's item master. It would be converted
19   as a part of conversion item number 2 above.
20   Do you know what that item number 2
21   above refers to?
22   A.   The item master from Eclipses.
23   Q.   So Lawson told Jackson that the vendor
24   catalog data in the Eclipses item master would be
25   included as part of the data that would be

228

1   converted in connection with this project,
2   correct?
3   A.   Right.
4   Q.   And was that, in fact, included as part
5   of the project?
6   A.   To the best of my knowledge, yes.
7   Q.   I think that's all I have. There are
8   some open questions. Were you able on any of the
9   breaks to find out any additional information in
10   response to our open questions?
11   A.   I don't believe so. I think we only
12   had one open question left.
13   MR. SCHULTZ: What is the open
14   questions that you recall?
15   MS. ALBERT: Now I can't remember them
16   all. I would have to go back over the
17   transcript.
18   MR. SCHULTZ: Let me look. We answered
19   the question with respect to the supply
20   chain -- the hosting systems. Why don't we
21   go off the record real quick.
22   THE VIDEOGRAPHER: We're going to go
23   off the video record. 4:15.,
24   (Off the record.)
25   THE VIDEOGRAPHER: We're back on the

229

1 video record. 4:17.,

2 MR. SCHULTZ: We were talking off of

3 the record with respect to the information

4 that Ms. Raleigh was looking for. The only

5 thing that is outstanding is for all S3

6 procurement implementation, the percentage to

7 which Lawson provided installation services.

8 By agreement of counsel, Lawson will

9 look up that information, and if it's

10 available, we will produce that information

11 in a letter. Is that correct?

12 MS. ALBERT: Fair enough. So that

13 concludes my cross-examination. I'll reserve

14 the right to ask recross depending on

15 Lawson's counsel's questions.

16 EXAMINATION

17 BY MR. SCHULTZ:

18 Q. There was some questions that were

19 asked regarding the percentage of time that

20 Lawson -- a Lawson customer uses Lawson's

21 services. In your answer you provided an 80 to

22 85 percent response.

23 Just to be clear, is that dealing with

24 80 to 85 percent of all of Lawson's products that

25 are sold and not just the S3 supply chain

230

1 management services?

2 A. That's correct.

3 Q. You also talked about that there were

4 13 customers that were either managed or hosted

5 by Lawson. Could you provide a breakdown of

6 which is Lawson's hosted and which are the

7 managed services.

8 A. I recall seven customers are Lawson

9 hosted and six are managed services only.

10 Q. And then in addition to those 13, then

11 there is the Jackson, which is a contracted

12 third-party hosted site?

13 A. That's correct.

14 Q. So it would be accurate, there would be

15 a total of 14 that are either hosted or managed,

16 whether it's on Lawson's service or a third party

17 hosted site?

18 A. Right. Contracted through Lawson.

19 Q. Do you recall -- if you could turn to

20 Exhibit 3, please.

21 A. Yes.

22 Q. In Exhibit 3, page 3, there was a

23 discussion about the Lawson 9 migration program.

24 Is that specific to the S3 supply chain

25 management system?

231

1 A. No.

2 Q. Does it have any relation to the supply

3 chain management system?

4 A. It would include the supply chain

5 management system, but other systems as well.

6 Q. If you could then turn to Exhibit 7,

7 please. Exhibit 7 is answers to RFP. Would you

8 agree that this exhibit includes answers to RFP

9 that are not related to the procurement services

10 or the procurement software that Lawson provides?

11 A. Yes.

12 Q. For the items that do relate to

13 Lawson's procurement services, are these

14 responses always used in a response to an RFP?

15 A. No, not always.

16 Q. So it would vary on the circumstance of

17 each particular potential customer?

18 A. Yes. I would say this is used as a

19 resource.

20 Q. If you could turn to page 31 of that

21 exhibit, so Exhibit 7, please.

22 A. Yes.

23 Q. It lists there the revenues from

24 licensed fees, maintenance, and consulting fees.

25 This is not a breakdown of the Lawson procurement

232

1 systems, correct?

2 A. Correct.

3 Q. This includes all of Lawson's products,

4 right?

5 A. That's correct.

6 Q. And that would include the financials

7 and the human resources?

8 A. And many other things too, yes.

9 Q. There were several times today where

10 you were referred to a document that says Lawson

11 recommends or Lawson highly recommends. Is it

12 always the case that the customer follows that

13 advice?

14 A. No.

15 Q. Is it often the case that the customer

16 does not follow that advice?

17 A. Depending on the specific advice, yes.

18 Q. If you could turn to Exhibit 15,

19 please. This is an application and environment

20 upgrade for conversion 7.2.2.4 to 8.0.3, correct?

21 A. Yes.

22 Q. On the procurement suite, what are the

23 modules that are included in the procurement

24 suite that are related to this particular

25 migration or upgrade? If you look on the first

233

1   page.
2   A.   **According to the first page, purchase**
3   **order, inventory control, and requisitions.**
4   Q.   So requisition self-service is not part
5   of this?
6   A.   **Not according to the title page.**
7   Q.   If you look at Exhibit 20, please.
8   Exhibit 20 is Lawson response to Public Health
9   Trust, Jackson Health System.
10   A.   **Yes.**
11   Q.   There were several references in your
12   testimony to tables where it listed
13   responsibilities of Lawson and also Jackson. You
14   can agree that the tables that are listed in that
15   did not necessarily have to do specifically with
16   the procurement software that Lawson was selling
17   to Jackson, correct?
18   A.   **That's correct.**
19   MR. SCHULTZ: That's all I have. Thank
20   you.
21
22
23   EXAMINATION
24   BY MS. ALBERT:
25   Q.   I have a couple of follow-ups.

235

1   gathered from a combination of systems at Lawson,
2   including our contracts system that would have
3   both the contract for the license and also the
4   statement of work.
5   Q.   And then within the last six years,
6   would there be any way to determine the
7   percentage of Lawson licensees of the S3
8   procurement applications that may have contracted
9   with the Lawson Professional Services
10   organization for upgrade services as opposed to
11   implementation of new systems?
12   A.   **Again, that information is probably**
13   **able to be found in our contract system based on**
14   **the service order forms or statements of work**
15   **that would have been written to do those**
16   **upgrades.**
17   MS. ALBERT: So I'm going to make a
18   request on the record that counsel for Lawson
19   provide me with those two categories of
20   information. I don't want to bring the
21   witness back, but I need to know that
22   information.
23   MR. SCHULTZ: We will look to see if
24   it's available. I'm not sure that it goes
25   back six years on the database. But we can

234

1   Referring back to Mr. Schultz's question about
2   the 80 to 85 percent percentage of clients that
3   utilize Lawson Professional Services, you
4   clarified that that referred to all Lawson
5   products, not just the S3 product suite.
6   For what percentage of licensees of the
7   S3 procurement applications does Lawson provide
8   professional services?
9   A.   **I don't know the answer to that**
10   **question.**
11   Q.   How could you find out the answer to
12   that?
13   A.   **Again, are we speaking about a**
14   **particular time period?**
15   Q.   Say for the last six years.
16   A.   **That could be -- probably be determined**
17   **from a review of the statements of work from the**
18   **last six years for those new customers.**
19   Q.   So how could I find out the identity of
20   all Lawson new licensees of the S3 procurement
21   applications within that six-year time frame and
22   then also determine whether or not those
23   licensees contracted with Lawson for professional
24   services?
25   A.   **That information would probably be**

236

1   look to see what's available, and we would be
2   willing to produce it if it is available.
3   Q.   Now, with respect to Mr. Schultz's
4   question to you about the 13 customers, supply
5   chain management customers for whom Lawson
6   provided either hosted services or managed
7   services, were those 13 customers within the
8   healthcare sector only, or was that 13 total
9   across all verticals?
10   A.   **13 total across all verticals.**
11   MS. ALBERT: Thank you. That concludes
12   my questioning. And we have those few
13   outstanding issues and documents that I
14   requested to be produced.
15   MR. SCHULTZ: We will look into whether
16   that information can be obtained. If it can
17   be obtained, we will produce that subject to
18   any of the objections that I lodged earlier.
19   THE VIDEOGRAPHER: That concludes the
20   video deposition of Hannah Riley consisting
21   of seven videotapes. We are going to go off
22   the record at 4:30.,
23   (Deposition concluded at 4:30 p.m.)
24
25

Raleigh, Hannah   3/4/2010 12:00:00 AM

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1   ACKNOWLEDGMENT OF DEPONENT

2   I, HANNAH RALEIGH, do hereby acknowledge

3   that I have read and examined the foregoing

4   testimony, and the same is a true, correct and

5   complete transcription of the testimony given by

6   me and any corrections appear on the attached

7   Errata sheet signed by me.

8

9

10   _____   _____

11   (DATE)   (SIGNATURE)

12

13

14

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1   E R R A T A   S H E E T

2   IN RE: ePlus vs. Lawson Software

3   RETURN BY: _____

4   PAGE   LINE   CORRECTION AND REASON

5   _____   _____   _____

6   _____   _____   _____

7   _____   _____   _____

8   _____   _____   _____

9   _____   _____   _____

10   _____   _____   _____

11   _____   _____   _____

12   _____   _____   _____

13   _____   _____   _____

14   _____   _____   _____

15   _____   _____   _____

16   _____   _____   _____

17   _____   _____   _____

18   _____   _____   _____

19   _____   _____   _____

20   _____   _____   _____

21   _____   _____   _____

22   _____   _____   _____

23   _____   _____   _____

24   _____ _____

        .   (DATE)   (SIGNATURE)

25

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1   CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2   I, Carol Williams, RMR, CRR, CMRS, CRI, CPI,

3   Registered Professional Reporter, the officer

4   before whom the foregoing proceedings were taken,

5   do hereby certify that the foregoing transcript

6   is a true and correct record of the proceedings;

7   that said proceedings were taken by me

8   stenographically and thereafter reduced to

9   typewriting under my supervision; and that I am

10   neither counsel for, related to, nor employed by

11   any of the parties to this case and have no

12   interest, financial or otherwise, in its outcome.

13   IN WITNESS WHEREOF, I have hereunto set my

14   hand and affixed my notarial seal this 9th day of

15   March, 2010.

16   My commission expires:

17   March 4, 2012

18

19

20   _____

21   NOTARY PUBLIC IN AND FOR THE

22   STATE OF FLORIDA

23

24

25

240

1   E R R A T A   S H E E T   C O N T I N U E D

2   IN RE: ePlus vs. Lawson Software

3   RETURN BY: _____

4   PAGE   LINE   CORRECTION AND REASON

5   _____   _____   _____

6   _____   _____   _____

7   _____   _____   _____

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        .   (DATE)   (SIGNATURE)

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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

PLAINTIFF *e*PLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND REVISED SUMMARY OF THE DEPOSITION OF HANNAH RALEIGH

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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